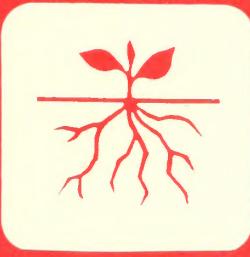
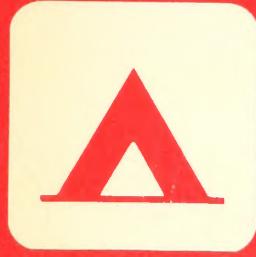
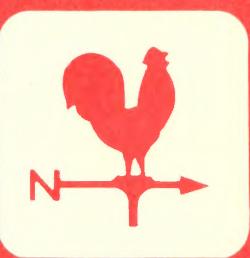




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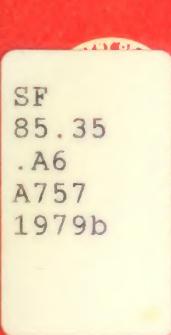
VERMILLION

Proposed Grazing Management

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FINAL ENVIRONMENTAL STATEMENT

VOL 2



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Prepared By
US DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ARIZONA

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Enclosed is Vol. II of the Final Environmental Statement for Grazing Management on the Vermillion Resource Area in Northwest Arizona. Vol. I is the Draft Environmental Statement you received earlier. Vol. II consists of the comments received on the draft statement and the responses to those comments. No changes in the analysis of the proposal or its impacts were required by the comments received on the draft statement.

The Arizona Strip District Office of the Bureau of Land Management prepared the environmental impact statement pursuant to Section 102(2)(c) of the National Environmental Policy Act of 1969. The document describes and analyzes impacts that would result from the proposed grazing management plan, along with four alternatives to that plan.

Thank you for your interest in this environmental impact statement.

Sincerely,

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DEPARTMENT OF THE INTERIOR

FINAL

ENVIRONMENTAL STATEMENT

VERMILLION GRAZING

PREPARED BY

BUREAU OF LAND MANAGEMENT

DEPARTMENT OF THE INTERIOR

A handwritten signature in black ink, appearing to read "Frank J. Legg".

DIRECTOR

SUMMARY

() Draft

(X) Final Environmental Statement

Department of the Interior, Bureau of Land Management

1. Type of Action: (X) Administrative () Legislative

2. Brief Description of Action: The proposed action of this environmental statement (ES) involves a livestock grazing management program within the Vermillion Resource Area on 1,407,476 acres of Federal lands. The ES area lies north of the Colorado River in the eastern half of the region known as the Arizona Strip.

The proposed action includes the following components:

- A. Intensive management of grazing on 1,369,043 acres of Federal land.
- B. Less intensive management of grazing on 38,433 acres of Federal land.
- C. Building range improvements and applying land treatments to facilitate grazing management.

3. Summary of Environmental Impacts:

Beneficial Impacts: The production of desirable vegetation and the total vegetation ground cover would increase. Overall watershed conditions would improve. Wildlife habitat would improve and the numbers of big-game and nongame animals would increase. Surface water quality would improve, and sediment yield would decrease. Overall range-related income would increase in the long term.

Adverse Impacts: Proposed range improvements would degrade the area's scenery. Although range improvements, cattle trampling, and erosion would slightly disturb archaeological and historical remains, these disturbances would be permanent and irretrievable. Range-related income, ranch values, and assessed valuation could decrease on some grazing operations.

4. Alternatives Considered:

- A. No action.
- B. Elimination of grazing on public lands.
- C. Stocking level by condition class.
- D. Benefit/cost.

5. Comments were requested from:

See chapter 9.

6. Draft Statement Made Available to EPA and to the Public:
March 1979

Final Statement Made Available to EPA and to the Public:
September 1979

ARIZONA STRIP DISTRICT MANAGER'S STATEMENT

This statement responds to comments concerning the Vermillion Grazing Draft Environmental Statement's proposed action and implementation of grazing systems.

Several comments received pertain to details of the proposed action rather than the analysis of the impacts of the proposed action. These include comments regarding the proposed combining of allotments and comments regarding the proposal of specific types and design of grazing systems. These comments are important because they will be helpful when the management program is implemented after the final environmental statement is published. Since these comments do not question the analysis of the proposed action, however, we have not specifically responded to them in this final environmental statement.

The provisions of the grazing systems analyzed in the draft environmental statement are based upon experience with range management on the Arizona Strip and upon the needs of the livestock industry as expressed by the permittees as they reviewed the situation at the time. The systems analyzed will work to improve range conditions. In several cases, however, the situation from a livestock production standpoint has changed. Flexibility to adjust to changing conditions and to adjust when new information becomes known is necessary to a good range management program.

Allotment management plans and the grazing systems proposed are intended to be subject to adjustment or change to ensure that the range improvement and livestock production objectives of the plans can be accomplished.

Specific changes and adjustments in grazing systems may be made in consultation with the permittees and land owners involved. (See flexibility discussion found on Pages 1-24 and 1-25 of the draft ES.) Amended systems will make adequate provisions for rest and seasonal grazing deferment to accomplish projected range improvement objectives. Immediately after release of the draft ES managers in the Arizona Strip began consultation with each permittee affected by the proposal. If significant changes are made that would result in environmental impacts not analyzed in the draft ES, an environmental assessment record will be prepared.

CHAPTER 9

CONSULTATION AND COORDINATION

ES PREPARATION

This final environmental statement (FES) was prepared by an interdisciplinary team of natural resource specialists from BLM's Arizona State Office and Arizona Strip District office. These specialists applied their expertise in botany, wildlife biology, soils, range management, visual resources, cultural resources, outdoor recreation, geology, hydrology, and socioeconomics. BLM's Washington Office and Arizona State Office provided periodic review.

CONSULTATION AND COORDINATION IN PREPARATION OF THE DRAFT ES

During preparation of the draft ES, BLM requested information from other State and Federal agencies and universities with special expertise relating to the proposed action. Records of requests are on file in the Arizona Strip District office.

The Arizona Strip District issued news releases describing the ES and requesting the contribution of interested individuals and groups. As a follow-up to the news releases, the District wrote letters to a broad spectrum of resource users, groups, individuals, and agencies. These letters described the Vermillion ES and requested information, opinions, and suggestions on its preparation.

The Arizona Strip District also prepared a slide series and accompanying discussion of the ES and presented it to interested clubs and organizations.

COORDINATION IN THE REVIEW OF THE DRAFT ENVIRONMENTAL STATEMENT

Comments on the DES were requested from the following agencies and interest groups:

Federal Agencies

Advisory Council on Historic Preservation

Department of Agriculture
Soil Conservation Service
Forest Service

Department of the Interior
Bureau of Reclamation
Bureau of Mines
National Park Service
Heritage Conservation and Recreation Services
U.S. Fish and Wildlife Service
Bureau of Indian Affairs
U.S. Geological Survey

Environmental Protection Agency

State Agencies

Arizona State Clearinghouse
Governor's Commission on Arizona Environment
Indian Affairs Commission
Arizona Game and Fish Department
Arizona State Parks Board
Agriculture and Horticulture Department
Arizona Department of Transportation
Office of Economic Planning and Development
Arizona State Land Department
Utah State Clearinghouse
Utah State Historic Preservation Officer
Utah State Engineer
Utah State Division of Natural Resources
Utah State Office of Planning and Coordination
Utah State Division of State Parks
Utah State Division of Wildlife Resources
Utah State Division of Lands

Local Governments

District IV Council of Governments
Northern Arizona Council of Governments
Mohave County Board of Supervisors
Coconino County Board of Supervisors
Mohave County Extension Service
Coconino County Extension Service
Mohave County Planning Department
Washington County Commission
Washington County Officials and Planners
Kane County Commission
Kane County Planning Commission

Other Organizations

Sierra Club
Izaak Walton League
Wildlife Society
Arizona Cattle Growers Association
Arizona Wool Growers Association
Arizona Conservation Council
Arizona Desert Bighorn Sheep Society
Arizona Farm Bureau Federation
Arizona Wildlife Federation
Arizona Wildlife Society
Audubon Society

Other Organizations (cont.)

Natural Resources Defense Council
Public Lands Council
Defenders of Wildlife
Pacific Legal Foundation
Environmental Clearinghouse
Utah Environment Center
Mohave County Livestock Association
Mohave County Farm Bureau
Utah Cattlemen's Association
Utah Wool Growers Association
Washington County Cattlemen's Association
Washington County Farm Bureau
Fredonia and Littlefield Resource Conservation Districts

Arizona Congressional Delegation

Utah Congressional Delegation

Interested Individuals

Copies of this final environmental statement may be examined by the public at the locations listed below:

Bureau of Land Management Offices

Washington Office of Public Affairs
18th and C Streets, N. W.
Washington, D.C. 20240
Phone: (202) 343-4151

Arizona State Office
2400 Valley Bank Center
Phoenix, AZ 85073
Phone: (602) 261-3873

Arizona Strip District Office
196 E. Tabernacle
St. George, UT 84770
Phone: (801) 673-3545

PUBLIC COMMENTS ON THE DRAFT ES

1. The Public Review Process and Procedures

The draft ES was filed with the Environmental Protection Agency on March 16, 1979, which provided for a 45-day comment period extending from March 23 to May 7, 1979. A notice of availability of the draft ES and a public hearing announcement were published on March 26, 1979 in the Federal Register.

Over 400 copies of the draft ES were mailed to Federal, State, and local government agencies, private groups and organizations, and individuals for review and comment. News releases from Washington and Phoenix provided information on how to obtain copies of the draft ES and where reference copies were available.

All written comments and the hearing transcripts will be sent with the final ES to the Secretary of the Interior and the Environmental Protection Agency. They are also available for inspection at the State Director's Office, BLM, Phoenix; the BLM Office of Public Affairs, Washington, D.C.; and the Arizona Strip District Office, St. George, Utah.

BLM reviewed and considered all comments and responded to those presenting new data, questioning findings of analyses, or raising questions or issues relating directly to the environmental impacts of the proposed action. BLM did not respond to comments not addressing the proposed action or the draft ES.

Although the public review period ended on May 7, 1979, BLM addressed 33 comments received through May 21, 1979.

2. Public Hearings

BLM conducted a formal public hearing on the draft ES on April 25, 1979 in Fredonia. Four BLM representatives served on the hearing panel, thirty-six individuals (not including BLM personnel) attended the hearing, and 14 testified. An administrative law judge presided, and a court reporter recorded the proceedings verbatim. The full hearing transcripts are available for review in the Arizona Strip District office.

Responses to the Public Hearing Comments
Fredonia, Arizona Hearing. April 25, 1979.*

Index

<u>No.</u>	<u>**Speaker</u>	<u>Representing</u>
1-2	Don Mackelprang Fredonia, Arizona	(Self-Rancher)
3-6	A. D. Findley Kanab, Utah	(Self-Rancher)
7	Trevor Leach Kanab, Utah	(Self-Rancher)
8-9	Preston Swapp Kanab, Utah	(Self-Rancher)
10	John Rich, Jr. Jacob Lake, Arizona	(Self-Rancher)
11-14	Kelton Hafen St. George, Utah	(Washington County Cattlemen's Association)
15-18	Kirk Heaton St. George, Utah	(Self-Rancher)
19-22	Mont Griffiths Fredonia, Arizona	(Self-Rancher)

*Mr. Stanley Esplin spoke at the public hearing, but since his oral comments were the same as his written comments, all responses can be found in written comment number six.

**List only includes speakers with comment response.

INDIVIDUAL COMMENTS AT PUBLIC HEARINGS

April 25, 1979 -- Fredonia, Arizona

<u>Index No.</u>	<u>Comment</u>	<u>Response</u>
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Don Mackelprang (Self-Rancher)

1. The only question I have is on some of the desert ranges. For example, on my range I know there isn't very much improvement work that could be done. But I do think that you should consider on some of these ranges erosion control dams and such improvements of that nature, where we can keep the water on the land other than letting it run off into the Colorado River. And this was never addressed in the environmental statement.

BLM agrees with the importance of watershed development and in the future will further plan for such development. Further water development, however, would involve another action and environmental assessment.
2. I also feel that on my management plan that was drawn up prior to the draft of the environment statement, I feel like it was a rush job and I think there's falacies in it that should be considered. And I'm sure there's going to be changes in it, but I think there should be more input into the management plan for the allotment, with experience and knowledge of the past grazing as well as the future.

See District Manager's statement at the beginning of the final ES.

Index
No.

Comment

Response

A.D. Findley (Self-Rancher)

3. Now, on this statement here, that's something else. I guess the whole thing is made on assumptions and suppositions. There's no factual evidence on any of it. Half of it is erroneous.

4. Your rainfall out here, here you've got on there 8.6 up to 11 or 12 inches. Here you've been measuring it for the last 4 years, and 3 inches is the most you've ever got; that's when you was making your study. Now, if that's fair in that book, it ought to be down so something is fair. There ain't anything fair about it.

All vegetation data were gathered during on-the-ground surveys on the Arizona Strip, as were soil, wildlife, historical, archaeological, and geological data. These on-the-ground data are the best that exist to our knowledge. The assumptions on the accomplishments of grazing systems are based on data from applied grazing systems on the Arizona Strip and some data from research outside the Arizona Strip. We believe these to be the best data for predicting grazing system accomplishments on the Arizona Strip.

The 8.6 inches of rainfall is a 45-year average for the Vermillion ES area, derived from readings at eight U.S. Geological Survey weather stations. Data from 1931 to 1972 are published in Arizona Climate (1974), edited by William D. Sellers and Richard H. Hill (Tucson, Arizona: University of Arizona Press).

The average annual precipitation was used to calculate the forage production by vegetation type. See appendix 1-1 (page A-1), Methodology for Forage Production.

The BLM rain gauge, referred to in BLM studies, near Home Ranch allotment has received a minimum of 3 inches and a maximum of 18 inches. BLM maintains 18 rain gauges across the Vermillion Resource Area, established up to 10 years ago. As expected, these gauges record large variations in precipitation. Precipitation data are on file at the Vermillion Resource Area office in St. George, Utah.

Index
No.

Comment

Response

5. You should have a feasibility study to go along with this thing. All this money you are going to spend. Is it feasible or isn't it feasible? Half of the things that you're spending on there, there isn't an outfit on the Arizona Strip on its own that could ever pay for it. For that reason, it isn't feasible.

6. I think this thing ought to be studied more. I won't say it can't work, but the plan you've got there now, it won't work, and no one can show me where it will. I'm willing to cooperate and do anything I can like that, but a guy don't like to be pushed around.

See District Manager's statement at beginning of final ES.

7. And on my range, the way they've got it set up, there's no way in the world any man, any man that knows the country, knows that you can't run cattle on the east side of that mountain in the summer. It's a winter range. If you go to puttin' them up in the canyon, they're not going to go to water. They can't get off to water. And that's where they're trying to force this for a summer range, and I want mine -- I'm not satisfied with it.

Trevor Leach (Self-Rancher)

<u>Index</u>	<u>No.</u>	<u>Comment</u>	<u>Response</u>
		Preston Swapp	
8.		And another thing I noticed, what type of water is on the Arizona Strip? It said, "good." I don't know what they call "good" water, but I don't believe there's hardly a spring on the Arizona Strip that is potable water fit for human consumption but what's privately owned. So I think they were in error there, as well as most of the rest of the book.	In this sense, good refers to value for wildlife and livestock consumption.
9.		Now, in there, they said that most of the people, permittees in this area belong to the Mormon faith. Now, the reason that they have made the range in such a poor condition as it is, is because they are Mormons and they believed that was part of their faith was to sweep the area just as clean as possible. And the reason they done that was because Brigham Young told them to. Now, that's entirely out of order.	This comment incorrectly interprets the intended meaning of the reference to the Mormon religion and Brigham Young on page 2-55. The word "mastery" as used on page 2-55 is meant positively--that the Mormon people take their stewardships seriously. The reference to Brigham Young simply means that Young encouraged the membership of the church to live in communities.
10.		The other thing I'd like to say is, that I question the BLM's ability to gather supporting data. And the main example that I can use is of	BLM maintains three rain gauges on the Paria Plateau--the maximum it can maintain with present manpower. Granted, three gauges cannot provide a complete picture of rainfall. One gauge per

Index
No.

Response

rainfall on our ranch, which is the Vermillion Cattle Company. We have two different divisions which comprise about 80 sections each and I know that they have one rain gauge on each division of the ranch. And in each division of the ranch there's a difference in elevation of 2,500 feet. And I don't know how they can possibly completely and thoroughly check what the rainfall is on 80 sections with one gauge on each one.

Kelton Hafen (Washington County Cattlemen's Association)

11. The very basis of the existence of this area are related to farming and ranching with the public lands all intertwined. Now, in some areas it may not be quite as important now as it was back 50 years ago or 100 years ago, but it's still very important. The economics of this thing for the entire western United States is more important than any of the statements that come out indicate.

pasture (12) would be ideal. The existing three gauges provide data where before none existed. The rain gauges are read at 2-to 3-month intervals. See appendix 1-1, page A-1.

The small community is important to the rancher, and the rancher is important to the small community. In the past these communities owed almost their entire existence to farm and ranch patronage. Changing conditions have brought additional benefits into the area through increased recreation and tourism. The desirability of the area has also induced small manufacturing firms to move into some communities. Although these economic sectors have increased personal income in the area and decreased community dependency on agricultural income, such income has a stabilizing effect on the economy. This study indicates that personal ranch income (receipts minus expenses) plus indirect employment (jobs dependent upon agriculture) produced about 1.6

- percent of the total personal income in the North Rim Social-Economic Profile Area (SEPA). This percentage reflects an overall average for the SEPA rather than specific small communities within the SEPA. The SEPA includes Kane and Washington Counties, Utah and portions of Coconino and Mohave Counties, Arizona that lie north of the Colorado River.
- This ES has attempted to portray the economic impacts to individual operators based on available data. (See Impacts on Economic and Social Conditions.)
- Range is rated in poor condition because it has less than 15 percent composition of desirable and intermediate forage species and 85 percent poor forage species. The causes are variable. As testified to by several longtime local residents, years ago livestock obviously overgrazed the range. Livestock numbers were later reduced, but by that time the seed source and space for desirable species had been removed and replaced by undesirable plants. These overgrazed areas would remain unchanged without land treatment because they lack an understory or seed source of desirable forage. Pinon-juniper and blackbrush types, however, that have an understory or remnant of desirable forage to provide a seed source and available space can and will improve in composition and plant vigor.
- Other major causes of poor range condition include natural soil erosion, natural ecological succession, and suppression of natural wildfire. Wildfire keeps brush and tree stands open, leaving room for desirable forage species.
- The grazing reductions that are recommended will make operating profitably on the Federal lands impossible for most operators.
- In the ES, they leave you with the impression that those ranges that are classified as "poor condition ranges" are due to overgrazing; this just isn't true. There are range specialists who are of the opinion that many predominantly blackbrush and pinyon-juniper ranges which fall in this "poor" classification are actually in a climax state, and after the reduction in livestock grazing over a period of years, they expect no appreciable difference in these ranges. These types of range are going to remain in a "poor condition" class until some impact agent such as land treatment or fire removes the existing vegetation. Why, then, are livestock reductions necessary on these allotments?

Index
No.

Response

Comment

Experience, data, and observation indicate that these ranges lack good quality forage, where in many cases forage could exist in larger quantities than it does today.

This reduction would bring livestock numbers to the carrying capacity provided by forage species. In the case of solid stands of pinyon-juniper, blackbrush, and other types demonstrating the same dominance, adjustments have been made. Should future studies by BLM or others indicate upward adjustments can be made without harming vegetation, they will be made.

In Public Law 95-214 under Section 8 we read, "If the Secretary concerned elects to develop an allotment management plan for a given area, he shall do so in careful and considered consultation, cooperation, with the lessees, permittees, and land owners involved." I don't feel this has been done. I haven't talked with any operator who participated in any of the studies done to determine the carrying capacity. I didn't even know when the studies were being done on my allotment, so how could I have participated in them?

Public Law 95-514 specifies that BLM will consult and cooperate with permittees in preparing allotment management plans (AMPs). The permittees in the Vermillion Resource Area were requested to participate in preparing AMPs. Most did participate and the plans reflect many of their ideas and needs. Some by their own choice did not participate. Some permittees participated in the inventory studies. BLM consulted the remaining operators during the planning phase.

We cannot respond to your question concerning participation in studies on your allotment, since your allotment is within neither the Vermillion ES area nor the Arizona Strip District.

Index
No.

Comment

Response

Kirk Heaton (Self-Rancher)

15. Referring to page 2-53, it discusses three operations that have been studied and from those three operations in the last two paragraphs, they projected the rest of the operations, indicating that 44 operations are probably losing money. But there's no specifics. They took three and said, "are probably losing." On the last paragraph it says, "may be losing." Page 8-21, there's similar language to the effect they're just really not too sure what effect that would have economically.

16.

While the proposed plan might look good on paper, it fails to consider the unpredictability of the weather and take into consideration the desirability of maintaining separate allotments for breeding young heifers and replacement stock. It also fails to consider the adverse consequences to the range that will result through the implementation of a rigid plan, as well as similar consequences to the livestock running on the range.

9-13

See responses 11 and 12. The data used were provided by Vermillion Resource Area ranchers during the cited studies.

The Arizona Strip District has practical experience with 28 implemented AMPs and understands the need for flexibility. The district has built in flexibility for erratic rainfall in all its plans and grazing systems (see draft ES, pages 1-24 and 1-25). The proposed plan does include a separate heifer pasture to be used by the operator for breeding and maintaining young heifers and replacement stock.

Also see District Manager's statement at beginning of final ES.

I think the plan is inadequate in the fact that it considers just adverse environmental impact to the range and only slightly brushes some of the social, historical, cultural, some of those other effects.

The document explores the cultural, historical, and social impacts to the degree required for the decisionmaker. It identifies only significant impacts.

The draft ES does not just identify adverse impacts.

<u>Index</u>	<u>No.</u>	<u>Comment</u>	<u>Response</u>
			Chapter 3 discusses improvements or increases in desirable vegetation, soil, habitat components, ground cover, and animal numbers, resulting from grazing management. Such projections were based on the Arizona Strip District's 28 rotation grazing systems operating for up to 12 years. The successful systems have taught BLM how to make the systems work in this environment.
18.		The specific objections, I'd like to put them in a written paper, but I think that the rain gauges on specific allotments, that's already been referenced, the studies being conducted in some of the drier periods. On our particular allotment, I'm unaware of any rain gauge. There was one on the corner of ours and one other party's that had a hole in it. And if that was the type of accuracy emphasized, I think that the facts on the situation are not stated here.	The closest rain gauge to the Heaton allotment is on Sunset enclosure in Wildband allotment (0.5 miles away). This gauge has never had a hole in it but has shown a rainfall range of 3 to 11 inches since 1971.
19.		This environmental impact, I'm sure, needed to be written so that the government and you and all of us would know the type of foliage that is located in our areas. But it was taken right at probably the worst drought that we've ever had in our area. And therefore, you being land manager	BLM recognizes this area's tremendous annual fluctuation in precipitation and forage production and has based range surveys and production on long-term average precipitation. The plants of the ES area have adapted to their environments. Some plants die during drought, but for the most part species composition of perennial plants does not fluctuate widely. During favorable

Mont Griffiths (Self-Rancher)

ment people should know that there are grasses that can survive drought and there are grasses and seeds that don't survive drought. And on a given period, like our last spring and this fall, I'm sure that if an environmental impact study were to be written today, that there would be different grasses and that the grasses that are there would be much stronger. And this environmental impact has quite an effect on your judgment on cutting our allotments. And in our past history, there are good years and there are bad years.

20.

Now, those guys that drive up and down them roads is not going to see a damn thing. A little cheat grass, squirrel-tail and a hell of a lot of sagebrush. But you get off in them breaks, which means you have got to walk a little ways; there's grass up to my waist, and I can take you down there today and show it to you. There's plenty of feed down there, and we're being cut.

21.

And another thing I disapprove is this joint-allotment business. I guess I'm a segregationist because I don't like black cows. There are people who like black cows, that's fine. And we had a 2,200 pound bull. Now, I know that's an awful large bull. I don't suppose that not too many people in here have

moisture years, annuals are highly productive, and perennial species regain vigor and increase production.

Five transects were made in this allotment. Two transects showed large amounts of the tall cool- and warm-season grasses. The AMP maps show these grass types to be in the breaks.

Combining allotments involving additional permittees was held to a minimum. Some combining of operations was necessary to arrive at a reasonable cost effective plan that would improve range conditions, meet objectives and maintain a yearlong operation for the permittees.

Index

No. Comment Response

2,200 pound bulls. But I have to take those cows up on irrigated pasture and have them fenced. And, now, if any of you people try to fence a black calf, they're just like fencing a pig. You can't keep a black calf in a pasture. Now, I don't know if you guys ever run cows or not. I run cows. See, I know what them buggers are doing and I don't care to have black cows in my stuff.

22.

Talking about the rain gauges. I would judge that there's one about 15 miles away. Anybody who's been on the range knows that when it rains it's not going to rain the same 15 miles away. And that's not giving us justice, just not giving us a square shot.

22.

And I feel this is the whole thing with most of us is, that we just want to be dealt with honestly, and fair. And if we can be dealt with honestly and fair, I think we will all try to work together with it. But I really don't think that we all feel like we are being dealt with honestly and fairly.

See responses to comments 4 and 10.

A rain gauge in Rock Canyon Tank allotment is approximately 4 air miles from the Griffiths allotment. Established rain gauges reveal that rainfall is scattered over the Strip. Over a period of years, however, the average rainfall in different locations is similar.

Responses to the Review Comments Received by the Bureau of Land Management
Index of Review Comments, In Order, Received by the Bureau of Land Management

Letter
Index
No.

1. U.S. Fish and Wildlife Service
2. Arizona State Clearinghouse
3. Arizona State Land Department
4. Arizona State Association of 4-Wheel Drive Clubs
5. Phil Foremaster
6. Esplin Cattle Co. (Stanley Esplin)
7. David S. McHenry
8. U.S. Environmental Protection Agency
9. Arizona Game and Fish Department
10. U.S. Soil Conservation Service
11. Drs. Irv and Kathy Ingram
12. Leo Reeve
13. Vard Heaton
14. State of Utah, Office of the Governor
15. The Wildlife Society, Arizona Chapter
16. Rolland Lamb
17. Ashby Reeve
18. Ira Schoppmann
19. Arizona State Clearinghouse
20. J. Grant and Alma Heaton
21. Jim Bryant
22. David J. Esplin
23. Trevor Leach
24. G. Elmer Judd
25. Darlo L. Esplin
26. Wildlife Management Institute
27. Howard Foremaster
28. David W. Ruesch
29. Owen Johnson
30. John P. Rich
31. U.S. National Park Service
32. Office of Economic Planning and Development
33. Norman H. Jackson



**UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE**

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MEMORANDUM

FEB 12 1979

To : State Director, Bureau of Land Management, New Mexico
State Office, P.O. Box 1449, Santa Fe, New Mexico 87501

FROM : Regional Director, Region 2 (SE)

SUBJECT: Vermillion Grazing PDES - Section 7 Consultation Biological
Opinion Pursuant to the Endangered Species Act of 1973 and
Amendments of 1978

This is in response to your memo of October 26, 1978, requesting formal
Section 7 Consultation for the Vermillion Grazing PDES in Arizona. The
Bureau of Land Management is proposing a grazing management program for
the Vermillion Resource Area and additional public lands in northwestern
Arizona, as described in the PDES. The program includes both intensive
and custodial grazing management (PDES, p. 3).

Two listed endangered species historically occurred within the ES area:
bald eagle (*Haliaeetus leucocephalus*) and American peregrine falcon
(*Falco peregrinus anatum*). The bald eagle may be present as a winter
migrant or inhabitant, however, this proposed program is not likely to
adversely affect the continued existence of the species nor their essential
habitat. The measures proposed in the management plan to reduce
livestock trampling and grazing immediately near water should enhance
those areas for bald eagles.

The American peregrine falcon may nest within and/or be a migrant through
the ES area. If effected as proposed, the grazing management plan should
enhance the habitat for the species and is not likely to adversely affect
the continued existence of the species nor its essential habitat.

The Endangered Species Act of 1973 and the 1978 Amendments do not require
Federal agencies to evaluate proposed species or their habitat for non-
construction projects, however, we recommend proposed species be considered
in the planning process in the event the species becomes listed prior to
completion of the project.

The Vermillion Grazing PDES indicates 51 plant species "proposed as endangered or threatened" in the Federal Register of July 1, 1975, and June 16, 1976, may occur in the ES area. Of those 51, only 26 have actually been located within the ES area. However, only the June 16, 1976, Federal Register was a proposed rulemaking; the July 1, 1975, was a Notice of Review of Status. Therefore, of the original 51 "proposed" species in the PDES, only 16 are actually proposed for listing, and of the 26 species located within the ES area, only eight are proposed. Table 2-4 of the PDES lists the 51 plant species - those which have an "E" beside them are the proposed plant species contained in the June 16, 1976, Federal Register. The statement goes on to conclude that because the proposed plants are mostly "pioneers" found on badlands, frail lands, or roadside cuts, which are seldom grazed by livestock, and are relatively unpalatable to cattle, that the "grazing systems would have little or no impact on the plants." There are threats to plants from grazing animals other than ingestion. Trampling and habitat disturbance caused by associated development such as roads, fences, etc., can destroy plants or prevent natural re-establishment/reproduction. We suggest you address specific management of the proposed endangered plants, which may include fencing to prevent cattle disturbance, in order to prevent their eradication from present locations.

We are working with the State BLM Office in Phoenix (Dave Anderson) on status evaluations of the proposed endangered plants in Arizona. Listing recommendations will be forthcoming in FY 79 from this office for those Arizona plant species/subspecies/varieties determined to qualify as endangered or threatened.

It is therefore our biological opinion that the actions proposed in the Vermillion Grazing PDES will not jeopardize any listed endangered or threatened species nor destroy habitat critical to their survival. Furthermore, the proposed actions should prove to be beneficial for both the bald eagle and the peregrine falcon.

We thank you for the chance to review this planning document. If we can be of any further assistance, please let us know.

- 1-1 According to the BLM team of botanists, the proposed action does not threaten the proposed threatened and endangered plants.
Botanists have observed no damage by livestock grazing in 3 years of field search. Potential damage from range improvements will be prevented by a field search at the project location before construction. See page 1-20, item 6 of the draft ES.



IMPORTANT: RETAIN NUMBER FOR FUTURE REFERENCE

(911)

Project: BUREAU OF LAND MANAGEMENT - ARIZONA STATE OFFICE

Vermillion Proposed Grazing Management Draft Environmental

Statement
Received by State Clearinghouse and sent for review.

S.A.I. No. Assigned: AZ 79-80-0022

The review is now underway. You will receive notice of the results of the review within the time allowed by the Office of Management and Budget Circular A-95.

Arizona State Clearinghouse

Phone: 255-5004=

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Arizona State Land Department

1624 WEST ADAMS
PHOENIX, ARIZONA 85002 DEC - 1967

AFR 1679

April 13, 1979

Mr. Robert O. Buffington
Arizona State Director
Bureau of Land Management
2400 Valley Center
Phoenix, Arizona 85073

Dear Mr Buffinton:

The staff of the Natural Resource Conservation Division of the Arizona State Land Department has reviewed the Draft Environmental Statement, Vermilion, Proposed Grazing Management. Generally, the document appears to be relatively complete and technically sound. The proposed action also appears to use sound

You may wish to consider the following comments in your further deliberation

- | | | |
|---|--|--|
| <p>3-1</p> <p>Where state land is involved, the combination of 115 allotments into 66 allotments will require changes in state leases or filing of subleases for those allottees now holding current state leases (ARS 37-283). Prior to final determination by your agency, all issues relative to the use of state land by multiple allottees should be settled.</p> | <p>3-2</p> <p>As proposed, the reduction of livestock numbers prior to the completion of improvements for management system implementation may have only limited value for range improvement, while maximizing the negative economic impact to the rancher. Before final determination, each allotment should be reviewed in detail, and every effort should be made to minimize the negative economic impact to the rancher.</p> | <p>3-3</p> <p>Although the addition of ten new positions will have a positive impact on the economy of the area, it appears questionable from a cost-benefit standpoint. Will the funding for these positions be taken from the locally available range betterment funds, reducing the fund available for on-the-ground improvements?</p> |
| <p>3-1</p> <p>BLM will coordinate and cooperate with the State Land Department before making final decisions on the allotments and combination of allotments.</p> | <p>3-2</p> <p>BLM will work at all times to minimize adverse impacts without compromising multiple-use objectives.</p> | <p>3-3</p> <p>As dictated by the 1978 Rangelands Improvement Act, the funding for more personnel will not come from range betterment funds.</p> |
| | | |

3-4 | 4. The sediment yield estimates (page 3-18) were lower than anticipated.
You may wish to review these figures.

Thank you for the opportunity to comment.

Sincerely,



Kelly R. Johnson, Director
Division of Natural Resource Conservation

KRJ:RY:nhk

cc: Office of Economic Planning & Development
Clearinghouse
State Capitol, West Wing
1700 W. Washington
Phoenix, Arizona 85007

Mr. William Templeton, District Manager
Bureau of Land Management
Arizona Strip District
P. O. Box 250
St. George, UT 84770

3-4 The sediment yield estimates have been reviewed and still appear to be correct, on the basis of data gathered and the methodology described in appendix 2-6, page A-30.



4

2839 North 49th Place
Phoenix, Arizona 85008
April 16, 1979
Bob Buffington
State Director
Bureau of Land Management
2400 Valley Bank Center
201 North Central Avenue
Phoenix, Arizona 85073

RE: DES Proposed Livestock Grazing Program
Vermillion Resource Area

Dear Mr. Buffington:

We have reviewed the above referenced DES, and on the whole, it appears to address satisfactorily the pertinent issues.

Our comments are limited to the following points:

- 4-1 1. The DES refers to the proposed ORV designations, now part of the Vermillion MFP, but does not provide a map to show them. We recommend that the Final ES provide a map of the proposed ORV designations.

This recommendation should be incorporated in all future Draft Environmental Statements, since ORV designations will have a considerable effect on an area's outdoor recreation opportunities.

- 4-2 2. The reference to the Sierra Club on page 2-56, last sentence, should be omitted. The Sierra Club is not the only national organization representing concerned outdoor recreationists, and the DES's reference implies some kind of special liking for the organization. Furthermore, the Environmental Statement should not be a medium of free advertisement and publicity.
- 4-3 3. The Glossary's definition of the term "wilderness" should conform with the statutory definition found in the Wilderness Act of 1964.

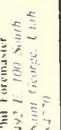
We hope the foregoing comments are fully considered in the preparation of the Final Environmental Statement.

Sincerely,

George A. Schade, Jr.
Land Use Chairman



GAS/Imh
cc: Mr. Jim Cain
President



APR 24 '79

St. George, Utah
April 13, 1979

Arizona State Director (911)
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

I have been studying for sometime the Vermillion Environmental Statement.

I honestly say to you that I have not digested everything even tho I hope to have learned something of ~~the~~ this proposal is going to influence our grazing operations. According to the letter accompanying the statement, if we so desire, we can express to you our feelings regarding the various proposals.

First and I think foremost among the many things that have been discussed in various meetings I have attended with BLM personnel and livestock people is this thought from the BLM that you folks over these some forty-five years of existence since the passing of the Taylor Grazing act, have failed. I think you are absolutely wrong in this thinking. I happen to have reached the age when I should be in a rocking chair and not bothering about these things. The fact of the matter is I have gone through these years of BLM and many years before and I know you haven't failed. I knew the range and I knew our problems before the act. I sit down and I fail to be able to conceive of what the range would be like now if the Taylor grazing act had not been enacted. Your BLM men deny there has been a trend for the better. I know the Public lands are much improved over what they would have been had something ~~had~~ not have been done. Of course I know that law suit and the variegated club and other such organization have scared hell out of you people and now you're pressuring on all sides for change. I want you to know that I for one at least, declare that you have accomplished things. We haven't agreed over these forty-five years on a lot of things, but I must admit the BLM has been no failure. A few employees were sent to us to implement the act and if you will permit me to give a little credit to local ranchers I should like to say that between the two they did a good job without too many errors. I think our first office force for the Strip consisted of two men and a lady secretary. Of course at that time we did not have so many organizations interested in the public lands.

I have gone through the draft and have underscored a lot of things and I would like to express my feelings to you. Somehow I obtained a feeling throughout the book that there is an anti feeling against the livestock people. In all instances the livestock and the livestock people were the culprits. In one instance as I remember the writers gave a little credit to the livestock people for the water they had provided for the birds and the wild game. I appreciated seeing this but shortly thereafter they minimized the good the livestock people had done by saying that the game including the birds etc. could not get much good because the livestock had trampled and destroyed things next to the water. In my opinion this is the damndest thing I have ever heard. We have spent thousands and thousands of dollars to provide feed for wildlife and we don't get a bit of credit. The book itself indicates that our cattle will be moved off of our waters and game will be placed on them. I doubt that you have the legal right to dispossess us and give our water to wildlife. I am sure you know that water is a sacred thing and a scarce thing on the Strip. It cost us \$4,000.00 to clean out a reservoir not too long ago. One can travel up to most reservoirs at times during the year and find water fowl there. Why don't you folks give us a little credit for these things?

The public has been advised that everyone had input into the preparation of the draft. They may have done but according to what I read in the draft about my own operation I was never invited to go out as they studied and analyzed the feed

5-1

Since the passage of the Taylor Grazing Act in 1934 the range has improved through efforts of the ranchers and the Federal government. Facts document this improvement (see Rangeman's Journal, December 1977). With rangeland, like products produced in free enterprise, a demand always exists to improve the current product and to improve it faster.

Better range condition is possible through better management, which BLM must do its best to achieve, with consideration to multiple uses.

5-2 The objectives of wildlife and livestock management often conflict. In the discussion of wildlife these conflicts come into plain view and could be interpreted as anti-livestock, not anti-stockman.

In multiple use management, conflicts arise between many of the different uses, not just livestock and wildlife. The proponents of some uses feel that any acceptance of arguments for other uses is an "anti" stance. This feeling is unfortunate and often misunderstood, especially when directed toward BLM, whose advocacy of multiple use management is in reality a middle-of-the-road stance.

I remember that the fellow, who had ~~Page~~² most to do with it, was leaving on another assignment in another area and he was pushing things and we never did have the chance to sit down and try to agree on anything. The BLM boys are now trying to get things worked out with us.

The great object in the early history of BLM was to get our individual allotments fenced so that they could check us more thoroughly. I thought this was a mistake but since then we have learned to appreciate individual allotments and hate community allotments. Now they want us to forget about individual allotments and be thrown in a community allotment. This we dislike and hope you will in some way try to avoid throwing us all together. Good labor is hard to get now days. It is hard to get several persons to do the proper work at the proper time. Some individuals run one breed of cattle and some another. I do wish you could set up your programs without having us operate together.

The BLM boys tell us we must take a stringent cut at once and then they look into the future and say that within fifteen years they may let us put a few more cattle on than we will be running after this cut. If they claim that they have failed in the last forty-five years what can we expect in the next fifteen? Why can't they make a smaller cut? Why can't they extend it over several years? why do they have to repeat of their forty-five year failure by cutting us and breaking many people all at once!

As I mentioned before, we are also very unhappy about our having to move off of our waters etc., take a heavy cut of even 97% in one case and let wildlife come in and take over! Wildlife has had a good deal up to date and it looks like they will continue to do so. We have furnished them water. We have furnished them salt. Why should you now ask us to give them rights? I have always believed in the multiple use policy and we have lived with these things but we do feel that we should not be treated in this manner. We've got to change our miles and miles of fences just to please them and satisfy their demands. It is grossly unfair in my way of thinking. Our calves will crawl under the fences into some one else's pasture and we will lose calves or will have dogged them.

For many years we have been running a certain number of head on our allotments based on range surveys which were made by your own men, I think that most of the live stock people have grazed within this framework. Now it seems that either those first individuals, who made the surveys were grossly wrong or the ones who have made these recent studies are wrong. I cannot think that just because the ~~the~~ various organizations, who have been aware of the public lands in recent years, shouted so long and hard as to make what you folks had done over the years a gross failure. We were always told that the early surveys were right. I fail to agree with the new theory that what they did and taught over those many years were wrong.

I hope that we can come out of this with some security. I think you know that we have spent a lot of money on grazing right. Of course that is not your worry but it does appear that many will go out of business entirely.
Yours very truly, *Philip Foremaster*

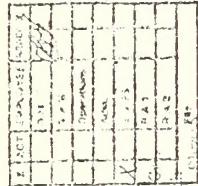
5-3 Combining allotments involving additional permittees was held to a minimum. Some combining of new operators was necessary to arrive at a reasonable cost-effective plan that would improve range conditions, meet objectives, and maintain a yearlong operation for the permittees.

5-4 Temple Trail and Antelope allotments are taking an immediate cut for the wildlife AUMs. The largest cut, for the rest pasture, in rest rotation will not occur until the projects and systems are ready to operate: 2 years for Antelope and 3 years for Temple Trail. Also see page 1-15, Stages of Implementation No. 1: "Adjustments exceeding 20 percent may be made over a period not to exceed 3 years after a final decision."

5-5 Wildlife are receiving 2 percent of the AUMs of usable forage in the Temple Trail allotment and 10 percent of the AUMs in Antelope Trail. Also see page 1-15, Stages of Implementation No. 1: "Adjustments

5-6 The old range surveys were not wrong, but demands have been made to give wildlife their fair share of forage. Thus new surveys were conducted to get an updated inventory for reallocation. Most of the reduction projected is for the rested pasture.

Attn: Mr. F. H. Parker
Bureau of Land Management
Phoenix, Arizona



To: Bureau of Land Management From: Esplin Cattle Co.
Robert O. Buffington David Esplin and Co.
Arizona State Director (911) 496 East 650 South
2400 Valley Park Center St. George, Utah 84770
Phoenix, Arizona 85073

April 9, 1979

Re: Comments concerning to Vermillion Proposed Grazing Management -- Draft Environmental Statement -- March 1979.

We have great concern and objections to specific points in the Vermillion Draft ES Statement as it directly applies to the Clayhole AMP (Allotment for Esplin Cattle Co., and David Esplin and Co.)

During the years 1967-1976, we cooperated with BLM in the two "three" pasture rest rotation systems on the Clayhole Allotment. After 10 years of the intensive AMP use, even though some changes and adjustments were made, we knew it was time to find a more workable grazing system--one that would work on the Clayhole Allotment.

After several visits with BLM officials stating our dissatisfaction with the continued results of our AMP, we were given permission on February 24, 1977 to change one of our 3 pasture systems to a 6 pasture rest rotation system. The same land treatments will take place in this new system; however, instead of resting 1/3 and 2/3 of the range, the rests will come in 1/6 of the pasture, resting until spring, and then 1/3 of the pasture will be resting. Cattle will be kept scattered over a wider area and lighter utilization will take place. Forage will be left in pastures after cattle have been moved to a new pasture.

We feel we can live with this 6 pasture system. The range will improve and cattle production will be maintained. Utilization levels will be held to 40 to 60 percent of current year growth. We feel range management practices will be satisfactory. NOTE: Page 1-14, No. 15.

The Draft ES proposed to put us right back in our old intensive "three" pasture rest rotation system.

We do not want to continue with an intensive "three" pasture rest rotation system. We want a system that will work on our allotment. We will give information and facts to show why the AMP written in the ES for the Clayhole Allotment (Esplin Ranch) will not be a practical system.

6-1 The Clayhole allotment has been under two three-pasture rest-rotation grazing systems. The smaller grazing system appears to be doing well. Most objectives are being met, range condition is improving, and the permittees seem to favor continuing with the system.

The larger system, on the other hand, has not met all objectives. BLM has not been able to increase livestock numbers as projected and is proposing a reduction for the allotment. Moreover, a decline in livestock production appears to be continuing. The system, however, has not been followed to the letter for one reason or another: lack of water, drought, or lack of forage. Utilization has been slightly higher than would be desired, indicating possible overstocking during the drought of the past 2-3 years.

Early in 1977 BLM recognized that livestock production was continuing downward and temporarily modified the AMP to reverse this trend. Lack of spring forage appeared to be a major cause of the decline.

BLM modified the plan to incorporate more grazing area that could be used in the spring.

BLM will work with the permittees to make systems workable and still meet the objective set forth in the ES. If the six-pasture system is selected, however, additional rest would probably have to be incorporated into the present system to allow objectives to be met. The six-pasture system being followed now appears not to provide adequate rest for reproduction of all plant species.

We have ten years experience in working with the proposed intensive "three" pasture rest rotation on a dry desert range (Clayhole Allotment averages less than 10 inches of rainfall per year.)

In 1967 in cooperation with BLM, we began two separate "three" pasture rest rotation AMP's. Among many objectives stated, two were:

1. Produce 1100 to 1200 calves per year.
2. Increase stocking rate by at least 10% over the next 10 to 15 years.

B&H
~~First~~ goals have continually gone down hill over the 10 year period. Present objectives in the new draft ES are essentially the same as the above over the next 15 year time frame. NOTE: Appendix I-2. Page A-11.

To implement our AMP in 1967, we voluntarily cut-out cattle from approximately 1800 head in these two systems to approximately 1500 CVL's (Cattle Year Long).

The new Draft ES again proposes more cuts which we object to. We feel with a workable, suitable AMP for Clayhole Allotment, more cuts are unnecessary.

NOTE: Appendix 2-4, Page A-20. Proposed meat carrying capacity for Clayhole to be 14,628 AUM. This is a drop from the current 19,620 CCA's to 19,243 AUM.

Through years 1967-76, we worked hard and made sacrifices to make the AMP work. Much more labor and time were involved and cattle production went down. But we felt these sacrifices were small pay in anticipation of an improved range and greater production from our cattle herd. For 10 years we have diligently cooperated with BLM to see if this system would meet the proposed objectives for us. Over the 10 year period (1967-76) revisions and other voluntary cattle cuts have been made; however, the intensive and heavy stocking of cattle on 1/3 of the range at specified periods of the year has not been altered. To put our whole herd of cattle on 1/3 of the Allotment causes over utilization to both forage and the limited supply of water. Very likely these intensive AMP's will work on high rainfall ranges; however, with the uncertain rainfall pattern on Clayhole Allotment, we found our cattle in trouble at one time or another in each of the previous ten years. Often the trouble came in the spring and/or summer. With our rainfall pattern it is not practical to bunch cattle in small areas. The forage is eaten into the ground and cattle at times do not get an adequate supply of forage or water. An intensive 3 pasture rest rotation on the desert Clayhole range will not work under the current climatic conditions to be desired, unrealistic, and unreasonable number of animals cannot be carried. These high cuts are absolutely unnecessary because there are ranges available that will improve range trend on desert ranges and also remain cattle production.

We, at this time, would like to cover years 1969-76 (a seven year period prior to our 10 year AMP) with cattle production during the 10 year AMP period. Incidentally, this seven year period follows 65 years of cattle grazing and ranching that took place 1900 to 1976.

We have always been interested in improving the forage and water development on our grazing allotments. We have invested much capital for this purpose.

Our grazing system 1960 through 1965 consisted of using the land and water around our ranch for now permanent improvements and water wells during the dry season. When rains would come in the spring or summer, our cattle would automatically drift to the outer less-used springs and perimeter for the remainder of the summer and fall months. This is a natural rest rotation system. This natural movement of cattle would give needed rest around the more permanent watering area. Also during the grazing season of high moisture years, an abundance of palatable annual grasses will grow. Our cattle would graze these palatable annual grasses giving necessary rest to the more valuable perennial grasses and browse plants, thereby saving the perennial grasses and browse plants for later use. This movement of cattle did not come about according to a day on the calendar but naturally occurred with weather conditions. This also happened with a minimum of effort and expense.

In an area on our allotment appears to be too heavily grazed, we would

move cattle to a new area and give complete rest so plants could produce needed re-growth. Apparently this natural system was not all that bad because range surveys by BLM during this 7 year period indicate range condition. NOTE: Page 3 A-2 for Clayhole Allotment; Quoted

"The bearing two-phase range condition survey indicated 90% of the Allotment is within the 95-130 rating. This survey was completed in 1962. NOTE: Appendix 2-5 trend studies in Draft ES, Page A-7. This table indicates trend to be between 100-109. This study was made between 1970 and 1977."

In summary, we hope BLM will not force us back into our old intensive "three pasture rest rotation system as stated in the present Draft ES. There are many grazing systems available which will improve the dry desert ranges but are not so intensive in their concentrating of cattle. We are desirous to cooperate with BLM to make a feasible AWP work; however, the "three" pasture AWP as stated in the ES is not a feasible or workable plan for the Clayhole Allotment.

We feel the six pasture rest rotation system will meet the needs of plant vigor and good range management and also alleviate some stress to livestock caused by the "three" pasture system.

Our goal is to improve the range land on our cattle allotment. Thank you.

Sincerely,

Shirley C. Espin
Bryant Cattle Co.
David Espin Co.

A D D E D C O M M U N I C A T I O N S & I S S U E S

6-3

1. In studying the BLM's draft, we definitely feel we have been slighted in projected range and water development and improvements are needed. As our alliance, it states only that improvements will be made as needed. Lack of water development will impede the work of our AWP. Range betterment funds are part of the grazing fees and should be used for range maintenance and improvements.

6-4

2. Appendix 2-5, Page A-26. We object to 28% utilization figure not being used to find utilization average for Clayhole Allotment.

6-5

3. We note and wonder why many reservoirs, water wells, roads and other improvements are not shown on the improvement map of the Draft ES.

NOTE: Page 2-16 Table 2-3

We object to the proposed production changes potential herd of 165 head for Clayhole Allotment and the 1705 head for the Vermillion area. This may antecede very seriously conflict with us for already established and given to the livestock industry. We have tried many times by BLM that the acreage here rental not exceed 100 head for the entire Arizona Strip.

NOTE: Page 2-16 Table 2-19

Ranchers have denied their position by over stating calving percentages and selling weights. These estimates as stated are usually by memory. A more realistic estimate would be a 70% calf crop and a 350 lb. average calf weight.

NOTE: Page 1-1, Paragraph 4 Be: "Cropping Action"

6-6

I seriously question the workability of the intensive "three" pasture rest rotation AWP in low erratic rainfall areas. To make it work, AWP's would have to be cut drastically.

Less intensive systems would improve the range and large cuts in AWP's would be unnecessary.

Thank you.

Sincerely,

Shirley C. Espin
Bryant Cattle Co.
David Espin Co.

(continued) Trend in the southern three-pasture system has not improved since 1969. Key species composition has declined 8 percent and trend index declined from 100 to 98. This response is explained by a few pastures receiving heavy utilization in the past few years. The heavy utilization in the southern system has also stressed cattle as well as plants. The allotment study data indicate utilization has exceeded 50 percent even during drought years, contributing to the downward trend in both vegetation and livestock production.

6-4 Several three- and four-pasture rest-rotation grazing systems are operating on the Arizona Strip--on Little Wolf, Little Tank, Toquer Tank, and Lower Hurricane allotments. These systems show a definite upward trend in vegetation composition and have maintained or increased livestock production.

BLM's experience with these systems emphasizes that improvement can be accomplished when systems are applied correctly. Data on the above allotments are available in the Arizona Strip District office or will be published in the Shivwits Grazing Management EIS in the future.

6-5 Some projects and roads were left off the maps to reduce clutter and confusion. Most if not all projects are a matter of record.

6-6 A 400-head antelope herd is planned for the Vermillion Resource Area. The total of 1,705 shown on page 2-16 represents the potential herd size, not the proposed herd size.

6-7 Analysis of the data you have submitted indicates your calf crops and calf weights since 1960 have averaged 82 percent and 399 pounds respectively. We do note that the average selling weight has dropped since 1971, seeming to coincide with the area's prolonged drought. Close examination of the yearly data indicates that the 1976 average calf selling weights returned to 400 pounds, coming immediately after a favorable year of precipitation, 1975. (See draft ES Table 3-4, page 3-8).

The data indicate that livestock production during drought is more closely related to precipitation and the corresponding vegetation production than to rest-rotation grazing. Rest-rotation, even during drought years, seems to maintain your selling weights and percent calf crops above those you estimate for your neighbors.

6-8 Three-pasture rest-rotation systems have been applied successfully to several allotments in the Arizona Strip District. Presently two three-pasture rest-rotation systems exist on the Clayhole allotment. The northern system responded better in upward trend of key species than the southern system.

The northern system has shown an upward trend from 100 to 124 since 1969, with an average increase of 18 percent in key species composition. This upward trend has resulted from moderate utilization levels and appropriate rest from grazing--about 40 percent of the 3-year rest/graze cycle.

Year	Cull Cows Sold	Number of Cows Sold	Total Weight Sold
1960	285 head	285	248235 lbs
1961	253	253	242172
1962	314	314	269452
1963	161	161	133506
1964	241	241	222229
1965	130	130	117796
1966	243	243	212181
Tots	1637 head	1637	1495521 lbs

Above figures = Seven years prior to our intensive 3' pasture rest rotation.

Year	Cull Cows Sold	Number of Cows Sold	Total Weight Sold
1967	187 head	187	171014 lbs
1968	158	158	141460
1969	119	119	107034
1970	222	222	210216
1971	141	141	124235
1972	152	152	128364
1973	120	120	113617
1974	150	150	132250
1975	169	169	150132
1976	110	110	98255
Tots	1528 head	1528	1378559 lbs

Notes:
 1. Yearly average before AMP $\{1960-66\}$ = 206503 lbs Sold
 2. " " " after " $\{1967-76\}$ = 137856

Difference 68647 lbs sold

3. 68647 lbs equals 76 cows at 900 lbs each

Year	Cull bulls Sold	Number of bulls Sold	Total Weight Sold
1960	44 head	44	51947 lbs
1961	38	38	47406
1962	39	39	45693
1963	29	29	33998
1964	51	51	58272
1965	45	45	53818
1966	26	26	29924
Totals	272 head	272	321008 lbs

Year	Cull bulls Sold	Number of bulls Sold	Total Weight Sold
1960	44 head	44	51947 lbs
1961	38	38	47406
1962	39	39	45693
1963	29	29	33998
1964	51	51	58272
1965	45	45	53818
1966	26	26	29924
Totals	272 head	272	321008 lbs

Year	Cull bulls Sold	Number of bulls Sold	Total Weight Sold
1960	36 head	36	42430 lbs
1961	20	20	24348
1962	21	21	25282
1963	29	29	34163
1964	31	31	34926
1965	20	20	24300
1966	17	17	20018
1967	15	15	17763
1968	18	18	21126
1969	23	23	26720
Tots	330 bulls	330	270576 lbs

Year	Cull bulls Sold	Number of bulls Sold	Total Weight Sold
1960	36 head	36	42430 lbs
1961	20	20	24348
1962	21	21	25282
1963	29	29	34163
1964	31	31	34926
1965	20	20	24300
1966	17	17	20018
1967	15	15	17763
1968	18	18	21126
1969	23	23	26720
Tots	330 bulls	330	270576 lbs

Year	Cull bulls Sold	Number of bulls Sold	Total Weight Sold
1960	36 head	36	42430 lbs
1961	20	20	24348
1962	21	21	25282
1963	29	29	34163
1964	31	31	34926
1965	20	20	24300
1966	17	17	20018
1967	15	15	17763
1968	18	18	21126
1969	23	23	26720
Tots	330 bulls	330	270576 lbs

Notes:
 1. Yearly average before AMP $\{1960-66\}$ = 206503 lbs Sold
 2. " " " after " $\{1967-76\}$ = 137856

Difference 68647 lbs sold

3. 68647 lbs equals 76 cows at 900 lbs each

Year	Cattle Sold	Number of Cattle Sold	Number of Cattle Sold	Total Weight
1960	1200	1200	1200	300000
1961	1275	1275	1275	321325
1962	1241	1241	1241	329376
1963	1242	1242	1242	329376
1964	1270	1270	1270	329359
1965	1320	1320	1320	329357
1966	1272	1272	1272	329357

Above figures = Seasonal average of our live
stock rotation. Estimated average of 1250 cattle sold.

Below figures = Total average of 116000 cattle, three year
pest rotation. Estimated average of 1200 cattle sold.

1967	1212	830	343291.5
1968	1130	807	335295
1969	1122	707	321287
1970	1185	765	325231
1971	1025	659	323246
1972	1156	639	312274.5
1973	1275	709	355200
1974	1142	639	318900
1975	850	614	322033
1976	925	659	343027
1977	8	55	55

Notes:

1. Seven year average before 1970 (1962-66) = 361000 lbs. estimate
2. Last five year average after 1970 (1972-76) = 351500 " " "
3. Difference 109500 lbs.
109500 pounds annually at 400 lbs. each.

The last three years
of AMP were all
less than 250 and the
of calves sold

ARIZONA STATE LAND
BUREAU OF LAND MANAGEMENT

SD	ASSOC SD
HIS	RESOURCES
RECDN SPC	MAGNT SPC
PUB AFF	OF
APR 26 79	

4-23-79

Arizona State Director (911)
Bureau of Land Management
2400 Valley Bank Center
Phoenix, AZ. 85073

RE: Draft Vermillion Grazing Environmental Statement

Dear Sirs:

I would like to restate my opposition to the 3.5 miles of pipeline construction in the Vermillion Cliffs Natural Area. Not only is this proposed project against adopted recommendations that were developed thru the BLM's planning process to protect the scenic quality of the Cliffs, but, also, pipeline construction is an inappropriate land use in this particular landscape and ecosystem and is counter to V.R.M. Class II Standards (BLM Manual). The results of construction will long be seen in the fragile desert--especially by people travelling between the Kaibab Plateau (North Rim of the Grand Canyon) and Lee's Ferry, Arizona. I therefore recommend that the pipeline not be constructed.

Also, the discussion of the visual impact of reservoirs and water catchments in Chapter 3 is meant to point out that reservoirs are an appropriate water development when designed to minimize their visual impact on the landscape and could be located in V.R.M. Class II areas. Water catchments should only be located in V.R.M. Class III and IV areas, and, as with all projects, should be designed to be in visual harmony with the landscape.

All in all I am pleased to see that the BLM is giving the visual resource equal consideration with other resources.

Sincerely yours,

David J. McHenry

David J. McHenry
Landscape Architect
1704 Florida Rd.
Durango, CO. 81301
(303) 247-5996



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

215 Fremont Street
San Francisco, Ca. 94105

Project #D-BUM-K65031-AZ

Mr. Robert Buffington
Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix AZ 85073

Dear Mr. Buffington:

The Environmental Protection Agency has received and reviewed the draft environmental statement for the PROPOSED LIVESTOCK GRAZING PROGRAM, VERMILLION RESOURCE AREA, COCONINO and MOHAVE COUNTIES ARIZONA. EPA's comments on the draft environmental statement have been classified as Category LO-2. Definitions of the categories are provided on the enclosure. The classification and the date of EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

EPA appreciates the opportunity to comment on this draft environmental statement and requests three copies of the final environmental statement when available.

If you have any questions regarding our comments, please contact Betty Jankus, EIS Coordinator, at (415) 556-6695.

Sincerely,

Paul De Falco, Jr.

Paul De Falco, Jr.
Regional Administrator

Enclosure

ARIZONA STATE LAND
BUREAU OF LAND MANAGEMENT

APR 30 79

SD	ASSOC SD
HIS	RESOURCES
RECDN SPC	MAGNT SPC
PUB AFF	OF
APR 30 79	
INFO	ACTION
SET ME	CF

APR 27 1979

APR 27 1979

Mr. Robert Buffington
Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix AZ 85073

Dear Mr. Buffington:

The Environmental Protection Agency has received and reviewed the draft environmental statement for the PROPOSED LIVESTOCK GRAZING PROGRAM, VERMILLION RESOURCE AREA, COCONINO and MOHAVE COUNTIES ARIZONA. EPA's comments on the draft environmental statement have been classified as Category LO-2. Definitions of the categories are provided on the enclosure. The classification and the date of EPA's comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions under Section 309 of the Clean Air Act. Our procedure is to categorize our comments on both the environmental consequences of the proposed action and the adequacy of the environmental statement.

EPA appreciates the opportunity to comment on this draft environmental statement and requests three copies of the final environmental statement when available.

If you have any questions regarding our comments, please contact Betty Jankus, EIS Coordinator, at (415) 556-6695.

Sincerely,

Paul De Falco, Jr.

Paul De Falco, Jr.
Regional Administrator

Enclosure

7-1 See page 1-21 Wilderness. This restriction would apply to the Vermillion Cliffs Natural Area - classed as an Instant Study Area.

Water Comments

1. (DEIS Page 1-21, Item 13)

The Draft EIS states that, "spraying projects will avoid all riparian areas by providing adequate buffer zones and limiting applications to periods when winds are four miles per hour or less." At a minimum the Final EIS should include:

- a) the basis for the determination that spraying projects will avoid riparian habitats by providing adequate buffer zones..."
- b) description of the size and location of the buffer zones.
- c) a map showing topographic gradients to surface waters and riparian habitats.

2. (DEIS Page 3-34 Vegetative Manipulation)

The Draft EIS states that, "A highly adverse short-term impact would result from the chaining, spraying and discing/plowing proposed for 1,120 acres in VRM (Visual Resource Management) Class II and 5,400 acres in VRM Class III." The Final EIS should discuss any water quality impacts such as; potential runoff, sediment yields, and any other impacts on surface waters. In addition, the Final EIS should include a discussion of measures to minimize the negative impacts on water quality as well as a discussion of measures to mitigate those impacts which cannot be avoided.

3. (DEIS Page 3-29, Riparian Habitat)

The Draft EIS states that, "The spring developments may adversely impact riparian habitat if all the water is gathered up and exported from the present spring areas and none is left available for wildlife at the spring source". The Final EIS should discuss in detail the justification of this action and its impacts on riparian habitat.

8-1

9-32

8-1 The only two allotments that would be sprayed are June Tank and Two Mile. Since neither has riparian habitat, neither would require the mitigating measure so stated.

8-2 Water quality impacts such as potential runoff and sediment yield are discussed under Land Treatment on pages 3-16 and 3-18, under Sediment Yield on pages 3-18 and 3-19, and again on page 3-20 of the draft ES. Since the proposed action would little impact water quality, no statement need be made in the mitigating measures. See pages 1-20 and 1-21.

8-3 The situation discussed would not occur unless a spring dries up as a result of drought. Item 9 on page 1-21 covers this situation. There is no justification for drying up a riparian area with the development of a spring.

8-2

9-32

8-3

EIS CATEGORY CODES

Environmental Impact of the Action

LO--Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER--Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU--Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1--Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2--Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3--Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

Commissioners
MILTON G. EVANS, Flagstaff, Chairman
C. GENE TOLLE, Phoenix
WILLIAM H. BEERS, Tucson
CHARLES F. ROBERTS, O.D., Bisbee
FRANK FERGUSON, JR., Yuma
ROBERT A. JANTZEN
Director
Attn. Director, Operations
PHIL M. COSPER



ARIZONA GAME & FISH DEPARTMENT

2222 West University Road Phoenix, Arizona 85223 422-3000

May 1, 1979

Re: Vermillion DES

Dear Mr. Buffington:

We have reviewed the above-noted document and would like to compliment you and your staff on the fine job you have done. We were pleased to see that an equitable amount of forage has been allocated for use by wildlife.

Obviously, the alternatives involving "elimination of grazing" and "stocking by condition class" would be more beneficial to wildlife than the proposed action. However, we realize that implementation of either of these alternatives would be a practical impossibility. If the preferred alternative can be adopted as described, the overall impact on wildlife will be positive.

We were glad to see that useable forage estimates were reduced by 25 percent, to allow for below average precipitation, when calculating stocking rates. Nevertheless, should the precipitation pattern cited on page 3-8 occur, the range will be overstocked three of those thirteen years. Can stock reductions be made rapidly enough to maintain desired utilization rates without resorting to the use of "resting" pastures?

While monitoring utilization during the grazing period, possibly the number of head in these pastures could be inventoried, rather than relying solely on data submitted by permittees to calculate actual usage.

We feel that mechanical methods or controlled burns are preferable to aerial spraying of herbicides for vegetation manipulation.

9-1 Stock reductions in most cases cannot be made rapidly. With the proposed reductions, the 50 percent utilization would be the average over the grazing cycles (3-5 years).

9-2 As a matter of policy, BLM does count cattle when supervising an allotment or during utilization studies or other visits to the allotments.

Possibly some 1/2 to 1 mile strips of riparian habitat could be fenced as exclosures for a period of approximately 10 years or until young trees reach the stage where they will no longer be damaged by cattle.

A few minor editorial comments:

1. Page 2-43, Item 3 probably should read
...during an unauthorized period.
2. Page 3-3, Paragraph 3, aream = area (?)
3. Page 8-27, Livestock Grazing, The reduction in the last paragraph here doesn't seem to agree with that cited on 8-25.
4. Page 3-24, First Line, Impact listed doesn't agree with the other items in that line.

In the long run, implementation of the proposed action would be beneficial to both grazing and wildlife interests. The Arizona Game and Fish Department solidly endorses your efforts to implement to proposed action.

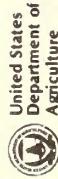
Sincerely,

Robert A. Jantzen, Director



Philip M. Smith
Wildlife Specialist
Planning and Evaluation Branch

9-3 As part of mitigation, 1,164 acres of riparian habitat would be fenced with possible additions if protection becomes necessary (see page 4-2).



United States
Department of
Agriculture

3008 Federal Building
230 N. First Avenue
Phoenix, AZ 85025

ARIZONA STATE OFFICE	
BLM LAND MANAGEMENT	
MAY 2 1979	
SD	ASSOC. 50
PREVIOUS	
TECH SER.	
MAP AFF.	
FFO	
CF	ACTION
	INFO
	SEE ME

Robert O. Buffington
State Director (911)
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Bob:

Following are the Soil Conservation Service comments on your draft environmental impact statement for Vermilion Proposed Livestock Grazing Program.

1-2

(Map 1-1) Spelling on title of map is not the same as that on the map. Map name is spelled "Vermillion".

10-1

1-4 (1) Rest rotation systems: Need to explain that a portion of the allotment will be rested (unless the entire allotment is to be rested).

(2) Some distinction between yearlong vs seasonal rest rotation and yearlong deferred rotation vs seasonal deferred rotation should be made.

1-11 (Table 1-3, 1-4, 1-5, 1-6) Pasture Rotation Systems. The following should be considered:

- (1) The proposed systems are too inflexible. Cannot take advantage of yearly differences in precipitation.
- (2) It is probable that there is not enough forage to support cattle for a whole year.
- (3) Pasture moves should be based on utilization and not on the calendar.
- (4) Reducing cattle numbers will not necessarily improve range condition when used with this type of inflexible grazing system. Grazing intensity will not decrease simply by reducing cattle numbers. (as described on Pages 3-35, Para. I)

10-1 The distinctions between seasonal and yearlong grazing systems are graphically illustrated on tables 1-3, 1-4, 1-5, and 1-6 and discussed in the ES from pages 1-6 through 1-14.

10-2 The grazing systems all have flexibility built into their plans (see page 1-24). Livestock would be moved at 50 percent utilization (see page 1-25). The tables cited include months/dates to illustrate average use periods. The Arizona Strip has 28 grazing systems that have been operating from 5 to 12 years. We understand the need for flexibility but also recognize that exercise of grazing flexibility must be constrained by resource objectives.

10-3 The proposed initial stocking rates and associated adjustments in livestock use are based upon the carrying capacity of the pastures to be grazed during a given year. Pasture-level stocking assures that livestock use will not exceed the forage supply of scheduled pastures during the grazing season. (See table 2-1, footnote 6.)

10-4 Livestock are to be moved from a scheduled use pasture when utilization of key species reaches an average of 50 percent for the pasture. (See pages 1-24 and 1-25.)

10-5 Data from AMP range studies in the ES area reveal that when utilization of key forage species is held at approximately 50 percent, range condition will generally trend upward. (See pages 3-6 to 3-11.) Adjustment in livestock use will decrease the average allotment grazing intensity. Without rotational grazing to provide periods of rest or deferment, however, repeated heavy use will occur on preferred areas of the allotment. (See pages 3-12 and 3-13.)



<p>1-12 Para. 4 (Deferred Rotation System - Part 3): "The system allows the maintenance of range condition and plant vigor." <u>Maintain</u> infers that current or existing conditions and vigor will stay the same. This appears to be in conflict with Table 3-1, P. 3-4, where it is displayed that "range condition would substantially improve under intensive management of grazing." Perhaps a better word than "maintenance" should be used.</p>	<p>10-6 BLM does not use an "excellent" range condition category. The word "excellent" was used to emphasize an objective.</p> <p>The need for a balance in grazing capacity of pastures is to insure enough forage to allow a long enough grazing period before reaching 50 percent utilization and to allow the next pasture to reach the desired phenological development before turning cattle into the pasture. Thus, in that sense, a balance in grazing capacity is important.</p>
<p>1-14 Para. 1, Part 4. "Range condition is good to excellent." The determination of range condition, trend, and utilization section in Appendix 1-1 (PA-9) suggests only 3 condition classes. If criteria has been established for an <u>excellent</u> condition class, it should be explained.</p>	<p>10-7</p> <ul style="list-style-type: none"> (1) See plates JE and LW in back of the draft ES, showing existing and proposed range improvements. (2) Engineering design criteria would be handled on a localized case-by-case basis and are not germane to the ES. (3) See item 1 above. (4) These specialized engineering and operational descriptions are not essential to ES preparation because associated impacts to the environment are not significant. (5) Some catchments and reservoirs would be fenced on a case-by-case basis as required by specific wildlife or environmental protection needs. (6) See item 2 above.
<p>1-18 First Para. The success of any grazing system does not necessarily depend upon having pastures of "comparable carrying capacities." The length of the grazing period can be adjusted to any pasture based on land size and available AIM's. Much more important than comparable carrying capacity is feed, forage, and livestock balance. Any system should be designed to give maximum benefit to the critical growth stages of the key forage plants.</p>	<p>10-8</p> <ul style="list-style-type: none"> (1) See item 1 above. (2) BLM recognizes the importance of Executive Order 11987 but the grasses listed may no longer be considered exotics on the Arizona Strip. The species have been used in seeding projects on the Strip over the past 30 years. We appreciate the information concerning native species seeding tests in the localized area. (3) BLM has a cooperative agreement in Arizona with the Soil Conservation Service (SCS) National Resources Conservation Districts. BLM, SCS, and other land management agencies are currently working to revise this agreement.
<p>1-19 Table 1-8 gives a summary of proposed structural improvements and Table 2-16 the existing developments. It would be beneficial to the reader to include a description of the improvements to be installed. It would be beneficial to know:</p> <ul style="list-style-type: none"> (1) The location of wells and how the water is distributed to different areas. (2) Describe how pipelines will be handled where crossing rock areas. (3) The distribution of reservoirs and catchments. (4) What measures will be taken to trap sediment in proposed reservations? Or what will be the operational life of the reservoir where sediment is accepted? (5) Will catchments and reservoirs be fenced? (6) What provisions against frost damage will be taken? 	<p>10-9</p> <ul style="list-style-type: none"> (1) The grasses listed are mainly exotics. This will make compliance with Executive Order 11987 (Exotic Organisms) very difficult. Several native grasses are being tested, 10 miles northwest of Colorado City. Many show promise.
<p>1-21 (Interrelationships)</p> <ul style="list-style-type: none"> (1) The DES should explain the relationship between the cattle industry and BLM in more detail. It is more than "limited extent". 	<p>10-10</p> <ul style="list-style-type: none"> "Limited extent" refers to agreements in managing privately owned lands such as exchange of use. BLM and the livestock permittees have entered into very few such agreements.
<p>1-26</p>	<p>10-11</p>

10-7

10-8

9-37

10-9

10-10

- 10-10** | (2) NRCD's - SCS should be included in this section.
- 2-8 The discussion of soils points out the information is useful for general planning only. Perhaps it would be desirable to have a statement that a third order soil survey is in progress to provide more detailed information a later date.
- 2-8 & 2-12 A time frame should be given for erosion rates.
- 2-36 (Line 4, 1st Para.) It should be made clear that the USFS only manages land. These are not USFS lands.
- 2-43 Top of page - 3rd condition. Should this read "unauthorized", and, also, should put "or" after each sentence.
- 10-12** | (Wilderness) The dates seem incompatible. These should be checked for accuracy.
- 3-4 Table 3-1. It seems unlikely that future grass key species will only increase 9%, while range in good condition increases 57% (38% current, to 95% future).
- 3-8 (Table 3-4) Substitute "precipitation" for "rainfall". Some snowfall occurs.
- 3-12 (3rd Para.) The statement about threatened and endangered plants is not compatible with the statement in the 2nd paragraph, 2-7. These 25 plants are only proposed.
- 10-13** | 9-38
- 3-16 Erosion, lines 6-7. Fine textured soils do not necessarily respond fastest to change in use. In fact, if the soils have been overgrazed for a long period of time the fine textured soils may be the slowest to respond.
- 10-14** | Lines 7-9, of the soils named, only Navajo clay has a fine textured surface layer. The other named soils have a moderately fine textured surface layer. The soil series in the area with a fine textured control section are Boysag, Cabezon, Collbran, and Navajo series.
- 10-15** | Plate 2 - The color code for pinyon-juniper shown in the legend is a bright green. This shade of green does not show on the map. The areas of pinyon-juniper on the map have a greenish-yellow color. For a person not familiar with the area they might interpret it as creosotebush.
- 2-8 The erosion rate shown is the current rate evaluated as described under Sediment Yield on page 2-8 (and appendix 2-6).
- 10-13 The dates shown are correct. Primitive areas were designated before the passage of the Federal Land Policy and Management Act (FLPMA) of 1976.
- 10-14 Under the proposed action, all fair condition grassland is projected to be in good condition, since grassland has a good potential to improve. These are average figures.
- 10-15 This comment is correct and the statement should have read, "The finer textured soils would respond the most to this change in use. The three main finer textured soils in the ES are the"
- 10-16 See the errata sheet in the map pocket of the draft ES.

		10-17	The Forage Production Method is based largely on data gathered at the U.S. Forest Service Desert Range Experiment Station (Utah) between 1934 and 1947. This method has been in use in Washington County, Utah and the Arizona Strip for 13 years. Intensive clipping and precipitation data were gathered in these areas for 6 years to determine production for the vegetation types found there. The Arizona Strip District has used this method to determine the initial carrying capacities for allotments under implemented AMPS. Subsequent utilization and actual use studies on these allotments have shown this method to be more than adequate. Like range site descriptions, the method is based upon clipping studies correlated with rainfall.
		10-18	Without proper consideration of range suitability for grazing, grazing will damage the range. The adjustments were determined on an allotment-by-allotment basis through on-the-ground range inspections.
		10-19	It is more difficult but not impossible.
		10-20	The areas designated for water development would be more disturbed than if no water development existed on that site. More use where no use occurred before, even with rest periods, would show some change and disturbance.
		10-21	The vegetation type maps display existing vegetation types.
		10-22	The reductions per allotment are clearly shown on tables 1-2 and 3-14. Permittees have not misunderstood what is happening to their operations.
		10-23	BLM has given these areas appropriate consideration for impact analysis and will give further case-by-case considerations when range management actions are implemented.
			All editorial comments in your letter have been noted.
			We appreciate being given the opportunity of commenting on this draft.
			Sincerely,
			 Thomas G. Rockenbaugh State Conservationist
			cc: Dir., Off. of Fed. Activities, EPA, Washington, DC (5 copies) R. M. Davis, Administrator, SCS, Washington, DC Kenneth L Williams, Dir., TSC-SCS, Portland, OR

Appendix A-15
It would be desirable to indicate the exotic species on the list. (see draft)

Appendix 1 (A-1)

The Jensen system of determining useable forage production is not the best system available. This system has not been used long enough for thorough testing, and it has been used in only one area.

Appendix A-2

The range suitability percent adjustment for slopes and rocks is questionable. This is a highly variable factor and changes with season of use, class of livestock, breeds, etc.

Appendix A-2

Range condition is a subjective measurement, as used in the draft environmental statement. It would be almost impossible to make a positive vegetative trend and condition determination without knowing the potential vegetation of the site.

General Comments:

1. It has been inferred in the DES that sizeable areas of vegetation (up to 60 acres) will be lost around water developments. Experiences with planned grazing systems have shown very minor losses of vegetation after the systems are established properly.
2. Some space should have been devoted to a discussion of species of plants that increase on sites versus those that invade sites. Climax or pristine or pre-settlement vegetation versus what is there now need to be discussed.

10-20 3. Are the vegetative type maps "potential" or "existing"?

4. The reduction in AUM's throughout the Vermillion Resource Area should be clearly explained in a separate section, so that all land users can easily see this major impact.
5. More attention should be given critical erosion areas and soils information that would help identify these areas.

We appreciate being given the opportunity of commenting on this draft.

Sincerely,



Thomas G. Rockenbaugh
State Conservationist
cc: Dir., Off. of Fed. Activities, EPA, Washington, DC (5 copies)
R. M. Davis, Administrator, SCS, Washington, DC
Kenneth L Williams, Dir., TSC-SCS, Portland, OR

Leo Reeve
35 East, 300 South Box 58
Hurricane, Utah 84737
May 1, 1979

MAY 3 '79	
SD	<input checked="" type="checkbox"/>
ASSOC SD	<input type="checkbox"/>
RESOURCES	<input type="checkbox"/>
TECH SER	<input type="checkbox"/>
RIGHTS SEE	<input type="checkbox"/>
PUB AFF	<input type="checkbox"/>
EFO	<input type="checkbox"/>
CF	<input type="checkbox"/>
ACTION	<input type="checkbox"/>
INFO	<input type="checkbox"/>
SITE ME	<input type="checkbox"/>

Arizona State Director (911)
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Gentlemen:

Please be advised I am not in favor and do not feel your allocation of my rights are fair and equitable as you have them in ATKIN MELI AMP.

I think it would be on a MUCH more EQUITABLE basis to include my allocation in all the pastures of the ATKIN MELI AMP and not be limited to just Whitecocks.

I should like to request that you consider this and advise me what my allocation would be on this basis.

Sincerely,
Leo Reeve

Leo Reeve
Box 58
Hurricane, Utah 84737

Drs. Ivy & Kathy Perrom
3133 E. Bloomfield Road
Phoenix, AZ 85032

II

Dear Sirs:

I would like to comment on the proposed livestock grazing systems in the Tri zone Strip. I strongly support any measure that will reduce livestock grazing to a reasonable level. I would like to see wildlife habitat values and watershed values of other parts of the state improved as well by control of grazing. Very high stocking levels according to generalization of range conditions is not a bad idea if the evaluation is unbiased and accurate. Thank you, *BLM*

13

The following comments are made by Ward H. Heaton for Heaton Livestock Co. concerning the draft Environmental Statement for the Vermillion Grazing district. The fore part of my comments I will address to the Draft E.S. in general and the later part I will address as to how it will directly effect our family livestock operation.

It was unfortunate that the Natural Resource Defence Council with the support of other groups could demand such a tremendous undertaking to be placed on the B.L.M. and the users of Federal lands administered by the B.L.M. especially at a time when so many other groups were showing concern in these lands for the first time and demanding that their interests be recognized. The Bureau was already suffering growing pains. This added responsibility really put the bureau in a bind. It was a tremendous new assignment that I am sure no one knew quite how to cope with. Because of the magnitude of task and time limit involved many of the surveys - studies - etc. had to be made by people outside of the bureau with considerable increased expense and in some cases inaccurate results.

Because of the time factor the study groups didn't have the opportunity to see the range under all conditions. The moisture or lack of moisture can either make it a feast or famine on the Arizona Strip. At the time of study it was pretty much a famine in most of the area and people unfamiliar with the range would not have been able to make a fair and equitable analysis of the actual potential of the range. In most case I am not questioning the integrity of those people making the studies, I am saying a person placed with such an important responsibility needs to be familiar with the local conditions - trends - past uses, and especially the local demands.

Quite often you hear the statement - "these are Federal lands - or public lands" and belong just as much to the man in New York City who has never seen it as they do to man whose grand father came here over a hundred and fifty years ago and he and descendants have been working with land (Federal land if you will) to make a living for themselves and their families ever since. Call it what you will - a right - permit - or what ever; as long as this is America as we know it, I think his claim must be recognized.

Those in the livestock business are the minority - But they help to fill the need of ever increasing demands for food and fiber, and should be given proper consideration.

There are those who say the B.L.M. has failed to improve the land since the introduction of the Taylor Bill. In some cases this may be true. I have been working with livestock on the Arizona Strip since the Fall of 1933. I have served on the advisory board since 1949 with the exception of the short time it was discontinued, and I can say the conditions on the Arizona Strip have improved. I know these improvements have been brought about by the close cooperation of the B.L.M. and the users of the range. I know if the users are given a little incentive or security in their claim they will continue to cooperate for range improvements.

13-1

Arizona Strip District personnel completed the survey and study data. A one-time survey by individuals has its weakness, as you state, but annual trend, actual use, utilization and weather studies are now ongoing procedures on your allotment. Data from these studies will replace all one-point-in-time survey data. You also will have the data to observe as accurately as possible what can and should be done on your allotment.

13-2

See responses to Comments 5-1 and 5-2.

In the study it proposes to combine some of the smaller allotments. It doesn't effect our allotment, but if it did I would certainly oppose it. In Utah we went from private allotments to community allotment, which didn't work, and now we are back to private allotments. No two operators breed and manage their cattle the same, their other operations off B.L.M. lands are not the same, in very few instances would community allotments be satisfactory.

The remainder of my comments will be directed to the effect the proposed draft statement will have on our operation. Twelve or fifteen years ago we got with the bureau and arrived at a number of livestock felt was what the range would carry. In 1974 we were encouraged to enter into an allotment management plan, which we did and at this time we again took a reduction.

If the proposal before us now goes into effect we will take another 9% reduction with the understanding that if the range can be improved it will be reinstated together with an additional 3%. These increases however depend on 1st: whether the improvement will be allowed, 2nd: whether congress will appropriate the money to carry them out, and 3rd: whether or not wildlife - (deer and antelope) will be allowed to take up the slack.

When I first started working on the strip there were very few deer (I never saw any). As the livestock people built more and better waters the deer came from the Kaibab Mt. and Mt. Trumbell until their were quite a few. Because of over advertising, the terrific hunting pressure and increased predators the numbers have certainly decreased in the past ten years.

The antelope have made some increase since their introduction in spite of the terrific predator problems.

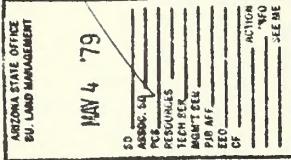
Wildlife and domestic livestock do compete for forage to some extent. As the numbers increase naturally the competition becomes greater. What I am saying is that if the bureau allows the wildlife to increase, any increase in forage brought about by range improvement practices will be utilized by wildlife and it will be impossible to reinstate the reduction taken in livestock numbers at this time.

As I stated before we entered into a management plan in 1974. Since that time our allotment has experienced a real bad drought. We have delayed moving our cattle from Utah the past three years to try and get by, and we have gotten by.

In our plan we should scatter our cattle over most of the range during November, December, January and February. Then in March we begin confining them, by April 15 they should all be in one pasture. The reason for this confinement, and it is a legitimate reason, is to give the early, cool weather grasses a chance to improve themselves. When we entered into the management plan we put a lot of flexibility into it and it may have worked had the weather cooperated. Up until now we have been able to stay with in the A.U.M.'s assigned to each pasture, but we have not always been able to be in the pastures on the dates specified in the plan.

When we could see a problem coming up we went to the area manager and were able to work out a solution. Had he insisted we stick to the plan with regards to dates and numbers we would have been in trouble. March, April, and May are nearly always a critical time for cattle and we need to come up with some system where we scatter the cattle rather than confine them during this critical time. I think this can be done since we have most of the 5th to the 10th of June and do not return until around the 1st of November.

If the multiple use principle will continue to be practiced and all legitimate uses be recognized.



Vard H. Heaton
5-2-79

13-3 See response 5-3.



ARIZONA STATE OFFICE BLU. LAND MANAGEMENT	
MAY 7 '79	
<i>[Signature]</i>	
SD	<u>ASSOC. SA</u>
PC	<u>NEIGHBORS</u>
TECH STP	<u>RECENT STA</u>
FPP AFF	<u>EFC</u>
C	<u>ACT 1980</u>
	<u>INFO</u>
	<u>SET ME</u>

STATE OF UTAH

OFFICE OF THE GOVERNOR
SALT LAKE CITY

64114

May 4, 1979

SCOTT M. MATHESON
GOVERNOR

Arizona State Director (911)
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Mr. Buffington:

The Environmental Coordinating Committee has reviewed the Draft Environmental Statement for Proposed Vermillion Grazing Management.

The attached comments stating Utah's position are submitted for your review and consideration.

Thank you for the opportunity to review this document.

Sincerely,

Kent Briggs
Kent Briggs
State Planning Coordinator

KB/t

Enclosure

STATE OF UTAH'S COMMENTS ON
PROPOSED VERMILLION GRAZING MANAGEMENT
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Only parts of nine allotments contained in the Vermillion Grazing Management area comes into the State of Utah. However, we are vitally interested in the grazing management in this part of the State and have reviewed the proposed draft Environmental Statement. We are favorably impressed with the depth of analysis anticipated from the implementation of the proposed action and alternatives.

We recognize that portions of the area under consideration are overgrazed and the projected 18 percent reduction in livestock grazing contained in the proposal would adversely affect the livestock users in the area. However, as the range improves over time, the effect should be positive both in terms of livestock grazing and wildlife.

We are somewhat concerned that no water improvement proposals would be considered for portions of the area in Utah because of the limiting effect of lack of water on effective grazing and wildlife use.

We suggest that in the final environmental impact statement more consideration be given to the impacts on the riparian habitat which occurs in the area.

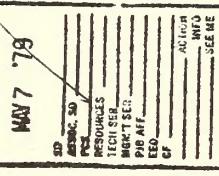
14-1

THE WILDLIFE SOCIETY

ARIZONA CHAPTER

P. O. BOX 35414 PHOENIX, ARIZONA 85069

ARIZONA STATE OFFICE
BUREAU OF LAND MANAGEMENT



Arizona State Director (911)
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dear Sir:

Thank you for the opportunity to review and comment on your Draft Environmental Statement for the "Vermillion Proposed Grazing Management" on behalf of the Arizona Chapter of the Wildlife Society. The Wildlife Society heartily supports the general principle being pursued by the Bureau of Land Management of improving the condition of the lands and resources under its control through more intensive management and consideration of specific site suitabilities. Past abuses throughout the West, especially in areas such as the Arizona Strip, have led to serious depletions of our resources to the detriment of the wildlife and wildlife habitat.

There are several areas the statement addresses that we would like to comment on:

- 1) We strongly recommend that fencing of all riparian areas be integrated into the proposed action, not just as a mitigation measure.
- 2) All water at any spring or seep should not be allocated entirely to livestock. At no time should springs be pumped dry, because the wildlife endemic to or dependent upon that water will be extirpated by the loss of that water source for even a short

15-1

The proposed action includes fencing of the riparian area in Lee's Ferry and various springs. Inventory and legal boundaries, however, need to be defined on other riparian areas.

15-2

See page 1-21, item 9.

15-2

period of time.

3) Proper use factor on key species should be less than 50% because of: a) slow vegetative recovery in the area, especially in the more arid portions; b) the admittedly degraded condition of the range due to livestock overgrazing; and c) your objective is to halt the downward trend and begin to improve the condition of the range in 15 years, not to simply maintain current range condition. Studies by Johnson (1953), Smith (1967) and the Arizona Inter-Agency Range Committee (1972) report that grazing at 30 - 50% utilization provides the greatest net revenue for the rancher.

4) Chapter 1 explains that increases or decreases in live-stock numbers due to actual utilization will be implemented. Our experience shows that when decreases are necessary they are difficult if not impossible to achieve because of political pressures. A section is needed that explains the mechanics of the grazing permit administration and issuance. For instance, how does the B.L.M. revise a 10-year grazing permit to adjust for excess utilization?

5) We agree with B.L.M.'s attempt to promote good will and a spirit of cooperation by requesting the rancher to report actual use. However, for several reasons, we do not believe that the B.L.M. can abrogate their responsibility in determining compliance with stocking rates. Production-utilization checks do not insure compliance. For example, non-compliance could be due to trespass stock not belonging to the permittee. We strongly urge that B.L.M. periodically conduct spot checks of livestock numbers on each

See page 3-6, table 3-3, and related discussion.

15-3

See page 3-6, table 3-3, and related discussion.

15-4

15-5

See pages 1-24 and 1-25.

15-5

See pages 1-24 and 1-25.

allotment, which could be done at the same time utilization plots are being read.

6) We prefer controlled burning to chemical control as a range improvement practice wherever possible.

7) On page 1-20, paragraph 7, reference is made to consulting with the U.S. Fish and Wildlife Service "If threatened or endangered species are found. . .". The Endangered Species Act of 1973 requires consultation on ". . . all construction projects. . .", whether or not endangered species are found in the area.

8) The use of the 'rest' pastures in bad years (page 1-25) when all animals, both livestock and wildlife, are stressed is counterproductive to the system and will continue to unsatisfactorily damage the resource. It is during these years that the rest period is most critical to the plants, since they also are stressed. By using a rest pasture in dry years, which are frequent in the Southwest, you would be nullifying any beneficial aspects of rest rotation grazing.

9) Due to the poor condition of the antelope habitat, especially in House Rock Valley, we recommend not only more A.U.M.'s be allotted to this herd but also the assurance of non-detrimental fences on the new construction projects.

10) We feel from evaluating your alternatives from all aspects that you made a very strong case for alternative 3, 'Stocking Level by Condition Class'. The Wildlife Society recommends that you adopt #3 as your proposed action, in light of its potential long term benefits to all the resources as well as to the livestock production capabilities of this area.

In general we support your intention of bringing livestock numbers and use into line with resource capabilities but we would like to recommend that some further thought and consideration be given to the methodology used and the level to which utilization is allowed under your key area, key species concept. Thank you again for allowing us to comment.

Sincerely,

Frank M. Baucom
Frank Baucom, President
Arizona Chapter, The Wildlife Society

Literature Cited:

- Arizona Inter-Agency Range Committee. 1972. Proper use and management of grazing land. 48 pp. (Published by Mimeo. Bur., Univ. of Arizona, Tucson.)
- Johnson, W.M. 1953. Effect of Grazing intensity upon vegetation and cattle gains on ponderosa pine-bunchgrass ranges of the Front Range of Colorado. U.S. Dept. Agric. Circ. 929, 36 pp.
- Smith, D.R. 1967. Effects of cattle grazing on a Ponderosa pine-bunchgrass range in Colorado. U.S. Dept. Agric. Tech. Bull. 1371, 60 pp.

15-6

Although grazing systems should not be broken, situations can occur where the rested pasture would have to be used. Some southwestern research (Paulsen, 1975; Arizona Inter-Agency Range Committee 1972, 1973; and Hughes, 1978) shows that if the rest-graze cycle is broken to allow management for plant vigor by holding utilization to 50 percent or below, as much or more can be accomplished than by just sticking to the rest-graze cycle at all times. This cycle, however, will not be broken until all other alternatives are explored.

15-7

Since 1970 all new BLM fences have been built to antelope specifications. The ADUs allotted to antelope were allotted in conjunction with the Arizona Department of Game and Fish.

16
Orderville, Utah

May 4, 1979

Arizona State Director (911)
Bureau of Land Management
2400 Valley Brook Court
Phoenix, Arizona 85023

Gentlemen:

In regards to the environmental protection agency I feel that I don't agree with your consideration I think the survey is erroneous. I do agree however on the two permits on top - Hatch's Canyon and my home - Hamil, an improving the water for summer use and rising Hatch's Canyon for winter use.

Respectfully,
J. Pollard, Land-

Orderville, Utah
May 4, 1979

RECEIVED
MAY 6 1979
10:00 A.M.
PHOENIX, ARIZONA

17

I feel, we users of the public land has been faced with threatening proposals from the our government agencies.

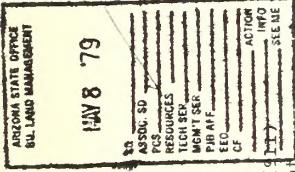
The Vermillion Draft environment statement, and the proposals that are presented in them has to make the greatest threat to the livestock industry within areas that they ever faced.

We surely don't need any more wilderness for the backscatter and wildlife.

You not thinking anything about the livestock first the wildlife, or that of the people future needs, livestock and etc.

We surely don't agree on many things are in your statement.

Bobby Reene



May 4, 1979

State Agencies:

Agriculture and Horticulture Department No comment

Arizona State Parks Board -

Indian Affairs Commission -

OEPAD - 208 Comment does not relate to ES

State Land Department See #3

OEPAD No comment

Arizona Game and Fish Department See #9

Arizona Civil Rights Division No comment

Center for Public Affairs Proposal supported

Department of Health Services No comment

Mineral Resources Department -

Mineral Technology -

Northern Arizona Council of Governments Proposal supported

District IV Council of Governments No comment

Arizona State Museum -

Comment does not relate to ES

State Land Department

OEPAD

Arizona Game and Fish Department

Arizona Civil Rights Division

Center for Public Affairs

Department of Health Services

Mineral Resources Department

Proposal supported

No comment

Mineral Technology

-

Northern Arizona Council of Governments Proposal supported

District IV Council of Governments

No comment

Arizona State Museum

-

Dear Sir:

See #3

Thank you for the opportunity to review and comment on the Draft Environmental Statement for the Proposed Livestock Grazing Program, Vermillion Resource Area, Coconino and Mohave Counties, Arizona.

For various reasons I oppose the BLM VALLEY WASH ALLOTMENT MANAGEMENT PLAN, of which I have an interest.

I propose to conserve my individual allotment management plan as is now established. I have had experience with a community allotment plan which has resulted very unsatisfactory in my opinion.

20-1

I have private and state allotments and feel that I can draw up a rest/rotation plan that would have greater benefits as compared to the BLM draft. In fact, I already have such a plan prepared in cooperation with the Soil Conservation District.

Sincerely Yours,

Alma B. Heaton
J. Grant Heaton

Alma B. Heaton
Alma B. Heaton
6225 N. Harvest
Flagstaff, Arizona 86001

cc: file

21

BLM LAND MANAGEMENT
May 8 79
5-7-79

SD	ASST. SP.
PRS.	TECH SER.
RESOURCES	MANAG'T SER.
TECH SER.	PUB AFF.
MANAG'T SER.	EEO
PUB AFF.	CF
EEO	ACT.
CF	INFO
SEE ME	

Mr. State Director (cont.)
Bureau of Land Management
2400 Valley Bent Center
Phoenix, AZ 85003

Dear Sir:

Last Friday, May 4th 1979, I met with Forest Service, Leif H. of the BLM in Kanab Utah on the Two Mile Allotment on the BLM Photoes, which I am the lessee of. The way the plan is set up at this time it will not work feasibly either for good management or economically. The plan would have us with our livestock in the Cottonwood & White Rock & then out of every five years. It is impossible to ship the Cattle that will go to market from either of these two pastures, also - these pastures are winter pastures and should be used as such.

I would recommend making three pastures out of the Society - Coal Valley - Two Mile pastures instead of two. This way it would be possible to rest one pasture a year of these pastures. I would also recommend making two equal pastures in Cottonwood & White Rock & making four pastures instead of two. This would make seven pastures in all which would give the best management possible. I would also recommend rescheduling the pastures that are resting in the areas that would take rescheduling.

Mr. Leifitt told me that the BLM didn't have the funds to do all this so I agreed that if the BLM would furnish the materials I would build the fences. Making these pastures would also change the winter situation which could be worked out. Making these changes should bring back the changes & rest for the pastures that are

Shane H.,
5-7-79

meected without having to cut the Cattle. Here's
Duan any - perhaps even increase the number of cows.

Jean Bryant
Box 45
Snowflake, Arizona



MAY 8 '79

SD
ASSOC. AG
PES.
REPRODUCERS
TECH SER
MOUNTAIN SHEEP
PHR AFT
EFC
CF
ACQUIS.
INFO
SEE ME

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

- Dear Sir:
- I would like to make the following statement concerning the Vermillion Proposed Grazing Draft Environment Statement.
- 1st | I study the ES and make proper comments.
- 2nd | Table 2-9 page 2-16 states that 1,705 antelope is the potential herd size also that 496 head is the potential herd size in the Clayhole allotment. These figures are much higher. The area won't properly care for such a large herd without the other users being effected severly.
- 3rd | Page 2-15 states by 1940 all antelope had been extrapeted.
- 4th | My father Lee Esplin has been ranching in this area since about 1910 and he never had seen an antelope till they were established in the 1960's.
- 5th | Page 1-3 states that existing allotments would be combined into 66 allotments. - Unless the allotments are owned by the same persons they shouldn't be combined together. That has already been tried and community allotments should be a thing of the past.
- 6th | We have spent close to 1 million dollars on range improvements in the past and each time our aum's are cut it takes the value out of our permit. All permits should have a value and the permittee should be repaid when his numbers of aum's are cut or his permit is taken away from him for some other use.
- 7th | We have been on an AMP since 1971 with the promise that our calf weights would be heavier and we could increase our numbers by 25% in 15 years. Now 9 years later this ES statement is asking for more cuts in numbers, also since going on the AMP our total selling weight has been going down each year.
- 22-1 | To meet the schedule for ES preparation, BLM must follow the recommended 45-day review period.
- 22-2 | See response 6-4.
- 22-3 | The last natural herd of antelope disappeared in 1918. The book Footprints on the Arizona Strip by N. J. Cox and H. B. Russell (1973) tells of antelope south of Diamond Butte. Other ranchers claim antelope occurred both above and below the Hurricane Cliffs. The book Arizona Wildlife Trophies by Arizona Wildlife Federation (1975) lists a trophy antelope buck taken in Antelope Valley on the Strip in 1878.
- 22-4 | See response 5-3.
- 22-5 | See response 6-5.
- 22-6 | See response 6-3.
- 22-7 | The Clayhole AMP has objectives to improve livestock performance, vegetation composition, condition, and trend, wildlife habitat, and watershed condition. The objectives are not promises. If objectives are not being met, the AMP should be adjusted. The present large three-pasture restrotation grazing system appears not to have met all the objectives due in part to only a third of the allotment being grazed in the critical spring growing period. Moreover, too many cattle appear to be concentrated for the available green growing forage and water. Other three-pasture grazing systems similar to this are working in the area. The objectives of the plan may not have been feasible or obtainable under the existing plan. If this is the case, the objectives should also be evaluated for feasibility. (Also see response to 6-1.)

We will never be able to run more cattle under the present AMP'S. In conclusion the outcome of this ES will either make or break our cattle operation on the Arizona Strip. We have had cattle or sheep there since about 1880. I hope we will still have a ranch left after this ES statement is final.

Sincerely,
Donald J. Esplin
Donald J. Esplin
262 South 600 East
St. George, Utah 84770

23

ARIZONA STATE OFFICE BUREAU OF LAND MANAGEMENT	MAY 8 '79
SD ASSOC.	12
PC'S	102
PERMIT	102
BL LAND MGT	102
RESOURCES	102
TECH STEN	102
PUB AFF	102
EFO	102
ACTEUR	102
INFO	102
SEE LSC	102

COYOTE ALLOTMENT:

61. 2 NH

**19 COYOTE SPRINGS GRID NO 102
KELLOGG SPRINGS
KELLOGG SPRINGS**

B.L.M.

2

May 2, 1979

23-2

Of the nineteen (19) reservoirs presently on the allotment the map only indicated the existence of seven (7). The map seemed to be a little more accurate when showing the improvements of my neighbors.

I do not winter and summer on the same part of my allotment. If I did I would kill out my vegetation. It is not practical to feed one area year around. The spring growth is the vital time for plant growth.

Page 9 of the Draft Impact Statement states that my calves weighed only 280 pounds per head. However, it did not state I had shipped all of my calves from the Coyote Allotment, born before July 10 of that year (1977) to my Utah Blackrock ranch. This meant that all of the calves that I sold from the Coyote Allotment that fall were only two (2) weeks to three (3) months old. Further more, it had not rained all summer.

I sold all of the calves to save the cows and protect the range. That is why the Coyote Allotment calves only weighed 280 pounds. The usual average weight is between 375 and 425 pounds per head.

I protest the way the proposed pastures are set up in the Draft Impact Statement. There is no application of common sense or use of livestock logic in the proposed fencing of the pastures. They do not go with the lay of the land. The way the draft shows the fencing of the pastures would put me out of business. There has to be north-south fence as I have previously discussed with B.L.M. personnel.

I do not know how the B.L.M. or Fredonia weather station could determine the average rainfall on the Coyote Allotment. There are no rain gages set up any place on the allotment.

There used to be a rain pattern here but not since the Nevada Atomic Proving Grounds were set up. This I feel has caused a drought condition over the years in this area. The westerly winds brought in radioactive fallout and the atomic blasts changed upper strata jet streams from their course.

I had calves which were born defective and some trees and cliffrose, etc. in the canyon have died out, not from drought but even in wet years. I feel the government should look into this matter very earnestly for the good of our country.

If I had to run my cattle on the Kaibab Mountain during the hunting season I would be out of business. People shoot cows and yearlings, molest them, shut them out of water, shut them in the water corrals, and open allotment gates. There are no game wardens around, nor B.L.M. personnel. No check points are set-up to see what the hunters are taking from the area. I know there are parties hunting without any license except a gun. I know this because the same parties in Arizona cannot draw out every year on the hunt.

2. There are no pipelines shown. However, there is presently a 6 1/2 mile pipeline and two (2) steel storage water tanks on this range.

23-3

The following are my comments on the proposed Allotment Management Plan for my B.L.M. permit and the Draft Environmental Impact Statement.

COYOTE ALLOTMENT:

I feel the B.L.M. has not given this allotment a fair evaluation on its carrying capacity or A.U.M.'s. I know most of the allotment was never even examined or looked at when the evaluation was made for the Allotment Management Plan or the Draft Impact Statement.

In an area approximately fifty five square miles, an evaluation was made on nine points. In nine points, there are seven that are either on an old cow trail or by a water tank in the thickest trees. I know this cannot be an accurate evaluation on this allotment. Also, on the Pine Hollow allotment in Utah, approximately 13 square miles was evaluated on four locations. Three of these locations were on stock trails by water holes and one was in the corner where I had hauled water during the drought.

The Coyote Spring area, which is my priority base, was the water source for most of the cattle and horses on the Paria Plateau and North Kaibab Mountain before the allotments were fenced. It was also the watering hole for all the trail herds in that area. In drought years Coyote Springs and Two-Mile Spring were the only sources of water for livestock and wild-life.

The following items were not even included on the map which accompanied the Draft Environmental Impact Statement:

1. Most of the reservoirs and water tanks were not shown.

2. There are no pipelines shown. However, there is presently a 6 1/2 mile pipeline and two (2) steel storage water tanks on this range.

23-2

PINE HOLLOW:

23-4 I have protest the Pine Hollow (Utah) Allotment being included in the Coyote Allotment as it has no business being included with that Allotment. It has its own water and is the winter range for my Blackrock Allotment in Utah.

This move was protested and I protest it again.

The Pine Hollow (Utah) Allotment was transferred to the Arizona B. L.M. office once before and proved to be an unsuitable range management move.

The map accompanying the Draft Impact Statement fails to show the existence of any reservoirs on the Pine Hollow Allotment. The one reservoir that is shown for the Pine Hollow Allotment does not even exist.

23-5 There are six (6) water tanks or reservoirs on the Pine Hollow (Utah) Allotment. The way it looks to me the B.L.M. has totally excluded all of the A.U.M.'s from the Pine Hollow Allotment. Just wiped it out as if it didn't exist at all. The cattle grazing in this allotment are taxed in Utah, not Arizona. It is a part of my Utah range and should not be included with my Arizona Range.

The game in this area are hunted as Utah game.

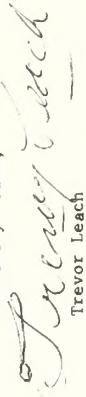
The Utah B.L.M. office looks after the Paria Primitive Area which includes part of the Pine Hollow (Utah) Allotment. The portion of the Pine Hollow Allotment that is in the Primitive Area is where the pack trail enters the Wire Pass of the Paria Plateau.

I feel the Pine Hollow (Utah) Allotment should be fenced at the Utah-Arizona line.

Page 12 of the Draft Environmental Impact Statement states that "Blue Grama and Sandhill Muhi are important to the ecology of the Sand Hills as mat forming species."

Forty years ago there was no grass on the area of the Sand Hills that is now in this allotment. More over there was none to speak of on the Kaibab Mountain which is also in this allotment. It came back to grass under my management as did other vegetative species, such as cliffrose and bitter brush, etc.

Sincerely Yours,


Trevor Leach

- 23-1 During the carrying capacity evaluation the entire allotment was examined, after which sites were chosen for transects. Seven transects were taken to represent the sagebrush and pinyon-juniper vegetation types. Two transects required transporting men in by helicopter, due to the rough terrain and no roads. Transects were located in good, fair, and poor condition sites.
- 23-2 See response 6-5.
- 23-3 See District Manager's statement at the beginning of the final ES.
- 23-4 See District Manager's statement at the beginning of the final ES.
- 23-5 See response 6-5 and District Manager's statement at the beginning of the final ES.

ARIZONA STATE OFFICE BLU. LAND MANAGEMENT	
MAY 10 '79	
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50	
	ACTICJ INFO SEE ME

Darlo L. Esplin
33 N. 500 E.
St. George, Utah
May 5 1979

Robert J. Buffington
Arizona State Director (911)
Bureau of Land Management
2100 Valley Bank Center
Phoenix, Arizona 85072

Dear Mr. Buffington,

Screaming approaching on the grass
that the grass will feel more cool
that I have on this spot.

At that time I know I should
that I should believe to here
I would like to have one of my
Almonator My School come up to stand

Pelman J. Smith

The reduction in the initial stocking rate on Lost Spring allotment results from a 10-AUM allocation to wildlife and a 7-AUM reservation for resource conservation. The permittee could use the 7 AUMs, since they were only shown as resource conservation AUMs because the number of cattle permitted drooses to run and the use period creates a 7-AUM bundle.

一一

25-2

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I am a cattle rancher operating on the Arizona Strip with interests in our family owned cattle companies (Esplin Cattle Co. and David Esolin & Co.). Our Ranch is enclosed in the Draft Environmental Statement for the Proposed Livestock Grazing Program of the Vermillion Resource Area. We have already submitted a statement from Esplin Cattle Co. and David Esolin & Co. pertaining to the Draft Vermillion ES, but I would like to take this opportunity to re-emphasize some of the statements already made and to make some additional comments of my own.

First let me state that I feel there has not been enough time allowed for the average interested individual to make a thorough study of the Draft ES. I have read through it, but haven't had the time to study and research it as it should have been done.

I find some worthwhile proposals and statements in the ES, but also find

Following are some of the proposals and/or statements that I object to and the reasons for the objection:

1. On page 1-3 the ES proposes to combine 115 existing allotments into Allotments. I feel this combination of smaller allotments would be a mistake and a step backwards in Management. This proposal would infringe on the rights and freedoms of the small operator forced into this system. The reasons for this are given by the ES on page 3-39.
 2. The three pasture rest rotation treatment schedule in Table 1-3 is too intensive and too severe on the Fanges and Cattle, during the 6 months that all of the cattle would be concentrated in one pasture. This is emphasized in paragraph 6 on page 2-37. "Following the 'green' as stated in the last paragraph on page 2-41 is not as detrimental to the vegetation as the practice of requiring cattle to be concentrated and kept in one pasture on a rest rotation plan that has had limited or no rainfall. Other reasons detail and proof can be found in the statement submitted from Esolin Catt Co. and David Esplin & Co.
 3. On page 1-21 the ES states that all new water developments will be constructed to meet the needs of wildlife. Why doesn't it also state that water developments will meet the needs of domestic livestock?

241

25-4

4. Why would additional BLM manpower be required to implement and monitor the proposed action (page 25), when additional manpower has already been hired to write the Environmental Statement?

25-1

See response 5-3.

25-5

5. I object to the proposed future curation of Pronghorn Antelope of 400 head for Clayhole Allotment (Table 3-8) and to the potential herd of 4,96 on Clayhole and 1705 in the Vermillion Area (Table 2-9) as being excessive in number. Our original AMP in 1966 set a goal of 200 for the Clayhole AMP. I also disagree with the statement on page 2-15 that Antelope-livestock competition for forage is generally not a problem on ranges in good condition. The only way that this many future or potential antelope can be put on the range is to substantially take away AUMs already established for livestock.

25-2

See response 6-1 and District Manager's statement at the beginning of the final ES.

25-6

6. On page 3-3 and page 3-15 the ES states 105 to 2065 acres of vegetation would be permanently disturbed by heavy grazing around newly developed waters, but at the same time that there was heavy grazing around newly developed waters there would be lighter grazing in the other areas of the range and by the same token vegetation would improve in these other areas because of this lighter grazing.

25-5

See response 22-2.

25-7

7. In figuring the Initial Livestock Rate AIMs (Table 1-2) for the Clayhole Allotment, 28% Utilization for 1975 (Appendix 2-5) was not used in figuring the Average Utilization per cent for Clayhole Allotment (Table 3-3) and therefore resulted in a lower Initial Stocking Rate than if it had been used in the calculation. If 28% was too low for 1975, by the same token why not eliminate the 70% Utilization in 1970 because it is too high, probably due to the low amount of rainfall that year (Table 3-1).

25-5

See response 6-4.

25-8

8. The ES states on page 3-12 that nonrotation grazing on five holding pastures would slightly decrease vigor etc. and range conditions would remain static or move slightly downward and undesirable shrubs etc., would increase slightly in vigor. This is not necessarily true as shown by the good condition (page 5-1) and the upward trend (Appendix 2-5) in the Clayhole-Yellowstone Pasture. The key to improved range conditions in this situation is to not overstock the range as has been the practice in the Yellowstone Holding Pasture.

9. In reading the Economic and Social Conditions in several different Chapters in this Study and the negative effect it would have on Ranchers incomes and the possibility of some even being forced out of the livestock business, no place did I find in this Study the Economic Impact this loss of income would have on the communities in which these Ranchers live nor the economic contributions they make to these communities by the commodities that they purchase, both personal and business wise. I think this should be an important item in this Study.

Thank you for considering these comments in preparing the Vermillion Final Environmental Statement. I hope you will study them seriously along with others that are received and make the necessary changes that will be for the good of all concerned.

Yours truly,

Darlo L. Esplin

Wildlife Management Institute

709 Wire Building, 1000 Vermont Ave., N.W., Washington, D.C. 20005 • 202 / 347-1774



DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
JACK S. PARKER
Board Chairman

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Dawn 21

9-56

ARIZONA STATE OFFICE BLM, LAND MANAGEMENT	
MAY 10 '79	
SD	ABDOC 24
PAC	PLAT 100-100
MAP	1:250,000
INFO	NEP, NEP, NEP
SEE ME	INFO
ACTION	INFO

May 7, 1979

The Wildlife Management Institute is pleased to comment on VERMILLION PROPOSED GRAZING-MANAGEMENT DRAFT ENVIRONMENTAL STATEMENT, Arizona.

The plan is adequate and covers most wildlife effects. Some items of mitigation need earlier implementation to improve wildlife habitat in a faster and more meaningful way.

We command the decision to form all regional and
6-2

We urge substantial fencing of reservoirs to improve waterfowl habitat. Examples of this type of fencing have been shown in many other areas; there seems to be no need to remove it here on an experimental basis (n = 2).

It is also well documented that bighorn sheep and livestock are incompatible. Bantian livestock reductions should be made in bighorn habitat now, rather than wait for a study (p. 4-2).

Wildlife problems caused by fencing should be mitigated (p. 3-23). Chained areas should have blocks, strips and individual trees and brush.

We recognize the political implications of livestock reductions. The decrease of 18,464 is a positive wildlife benefit. Recovery of damaged areas would be speeded if greater reductions could be made.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

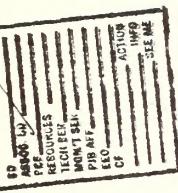
Alvin Atlee

Daniel A. Poole
President

DEDICATED TO WILLIE SEE SINCE 1811

May 7, 1979

MAY 10 '79



Arizona State Director (911)
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85075

Dear Sir:

Regarding the Draft Environmental Statement for the Proposed Livestock Grazing Program, Vermilion Resource Area, Coconino and Mohave Counties, Arizona, I would like to make the following comments. The proposed Allotment Management Plan which my grazing permit would come under would increase the number of permittees from two to Six. Most cattlemen would probably agree that the more operators there are in a single operation, the more difficult it becomes to coordinate activities and to take proper care of the range. The result of putting that many operators together could possibly be a deterioration of range conditions rather than an improvement. The purpose of the Taylor Grazing Act as I understand it was to move cattlemen out of a commune type situation into individual allotments where they would have the incentive to protect and improve the range. I am not opposed to Allotment Management Plans, however, I feel that the plan proposed for our area is not workable nor practical. I would like to work with local BLM personnel in developing an alternative plan.

27-1

27-2

The Statement calls for an approximate 30% reduction in cattle on my grazing permit. The reduction seems excessive to me. A preferable course of action would be a gradual reduction with a continual reevaluation of the grass conditions to determine a satisfactory carrying capability. The BLM employees in your local office are competent individuals who seem sincerely interested in arriving at a viable multiple use of the public lands. Decisions in regards to alterations in Allotment Management Plans or possible reductions in cattle numbers ought to rest with the people closest to the situation.

I hope that these comments are constructive and will receive due consideration in the development of the final Environmental Statement.

Sincerely,

Howard Foremaster
Howard Foremaster

cc. Perron Leavitt

Draft Environmental Management Plan
Bureau of Land Management
3400 Valley Park Center
Phoenix Arizona

8-5-73

9-58

Dear Director

Pursuant to the invitation that
had been issued to send in comments
on the Draft Environmental Statement
for the proposed Livestock
Ranching Program, Vermillion resources

the I.D. No. 3 -

area, Counties of Mohave County
Comments that I make about the
Draft Environmental Management Plan
about this proposed program are of
necessity from the stand point of the
livestock license & grazier of the
public lands. I have been raising
livestock for over 30 years and before
the inception of the Taylor Grazing
Act of June 28, 1934.

I will remember the "forders" of sheep

that ruled the range and cattle before

Homestead & Ranch Act of 1866

2-

3-

be done. I don't think the Taylor Act was
done. I don't think the Taylor Act was
passed. In this area which is considered under
this Draft Environmental Statement (the
rightly some of the land sections around Vermillion (area) I feel that a lot of good
is being done by the setting up of enough
depository of private allotments.
This had a much deserved effect of
making the users of the range concerned
& partially along with BLM officials
responsible that the range not only not
deteriorate but that they should be
improved through better distribution of
livestock, failure to overstock and in home
cattle, elimination of undesirable plants even
considering with desirable pasture areas
before developing. Considering warrant it. In most cases
before the inception of the Taylor Grazing
Law at that time it was told us all that we
ranged had to work harder than than deterioration.

I know that after some experience

I requested that we set the stocking rate

and I see that something needed to
with the consequences upon

this was set up on this allotment was to highland would result in range deterioration. This was done. Salvo did some minor development to help with better distribution live stock. In cooperation of myself & the B.L.M. we also had a brush trailing project to remove some of this allotment. I am sure the grass looks better for a while where this had been done but I feel like very little permanent improvement was made thereby as this trailing didn't kill the roots of the sage brush and it mainly grew back.

I would like to call your attention to Chapter 1- Description of the proposed action - Particularly a paragraph on the page labeled 1-5 which it states along with other information to be deleted. I can't see the correlation of this proposal would allow 89554 UAMS figure with any of the previous ones. The point I'm trying to make is that any reduction of 1930 UAMS or an overall reduction of 18%

I would also like to point out the figures shown in Table 1-2 Page 1 of the allotment. On the allotment carrying capacity has been stated a 5 year lease figure for the average 5 year lease figure is slightly larger than present 28.1 grazing. Now I realize that I may not understand exactly how you have arrived at these figures but I feel like the average 5 year lease is not out of line with conservation and preservation of the land resources allotment. If this is based on many years of practical experience in this area a desire both to stay in the livestock on the estimated carrying capacity of 1385 business and to preserve the range as a heritage for the next generation. I wish further to say that the BLM labeled Total Est. Sheep UMS and comes out at 6357 UAMS - I he reduction is over 50% to be deleted. I can't see the correlation of this more reasonable & comparable than the figure with any of the previous ones. One we have been contact with both on the Utah side of the line and in the Nevada area which is near

7-

enough to think that we are associated with the stockmen that are there I cargo and know quite a bit of what goes on.
We do feel like there has been a tends very partly due to the fact that some of these range surveys were made during times of extreme drought to how late the carrying capacity or during periods of time below what it will handle within the realms of proper range conservation management.

We are as anxious to have this range continue to function without deterioration as anyone & would work to that end, but we believe should have some input in determining the course of action.

Howard S. French
David W. French

28-1

The 635 AUMs under the column Total Est. Inc. AUMs include the estimated AUMs of usable forage that would result from 15 years of intensive management. You would receive a portion of this increase or a portion of whatever increase occurs.

The 635 AUMs do not correlate to the average 5-year use and the carrying capacity. The carrying capacity figure of 1,205 AUMs is equivalent to the 787 AUMs initial stocking rate, 56 wildlife AUMs, and 362 resource conservation AUMs. The resource conservation AUMs result from the rested pasture in the three-pasture rest-rotation system.

The 18 percent cut figure you cite is an average cut for the entire ES area.

28-2

The range surveys and production were based on long-term average precipitation. Refer to appendix l-1 for survey methodology.

ARIZONA STATE OFFICE BLD. LAND MANAGEMENT
MW 9 79
SQ _____ ASOC. S. _____ PC _____ HSU/SER _____ T-2 SER _____ WELT SER _____ FIR. AP _____ CL _____ C. _____ ACTION INFO SEE ME

Moccasin, Arizona 86022
 May 6, 1979
 Arizona State Director (911)
 Bureau of Land Management
 2400 Valley Bank Center
 Phoenix, Arizona 85073

Dear Sirs:

This is my answer to the Vermillion Proposed Grazing Management and Draft Environmental Statement.

Sincerely,

Owen H. Johnson
 Owen H. Johnson

Enclosure

Upon reading and studying the "vermillion proposed Grazing Management and Environmental Statement, I too am sick at heart for I found there some untrue statements, some things that never should have been said, things left out that should have been said, much speculation, and a tendency to brand the rancher and my ancestors as public enemies. Also, I am now more convinced that our Government is rapidly heading toward that goal of bureaucratic, dictatorial control of the lives of "we the people".

Today I got in my pickup and drove over a large part of the strip area, east of the Hurricane Fault. As I traveled, I was thinking of the 63 years that the Arizona strip has been my home, and especially the 50 years that I have earned my living here. A horse wrangler for the roundup at 13 years of age, as a cowboy, a bronc stomper, rancher, farmer, logger, and a livestock inspector. I compared conditions back then to what they are now. Much of the freedom and the wide open spaces are gone. I suppose civilization has necessarily taken this from us.

I remembered the old water holes at Antelope, White Pockets, Layholes, Yellowstone, Cane Beds, Short Creek, Scotties Seep, Bullrush, Nails Crossing, Pipe Spring, and Kanab Creek. As I traveled, I found, today, windmills, ponds, reservoirs, spring developments and pipeline, corrals, fences, and other developments and range improvements which have cost the ranchers many, many thousands of dollars. This fact is hardly mentioned in the statement. I observed that each rancher now has his own individual grazing allotment, and I thought of the men, and a few women ranchers, all my friends. Most are good, solid, honest, hard working citizens who are in the ranching business to make a living. They are concerned about range conditions and know if they abuse their range, etc.

their business is a failure. They have the intelligence (a fact not recognized by some bureaucrats) and the guts to fight drought, deep snow, predators, thieves, disease, low cattle prices, high operating costs and yet kept right on smiling. Now I find them angry, scared, and sick, because as one rancher put it, "I get sick to my stomach whenever I think of our Government, more rigid BLM control over my life and livelihood and the power they assume to cut my AUMs and take away any chance I have to come out ahead".

The Statement says the trend is down. What I saw this morning indicates to me that the trend is definitely up - so greatly improved over the range conditions 30 years ago. Why are the ranchers being forced to take a cut in AUMs in view of this?

29-1

9-62

Why are the ranchers being forced onto a rest rotation or intensive management plan when those already on the plan have testified that it will not work on the Arizona Strip. I, too, have observed more overgrazed range, less cattle, lighter calves on those ranges under this plan.

Why were the ranchers not given more opportunity for input before the statement was published when, in fact, he is the one who knows. His education has come down from a lifetime of experience in grazing on the Strip.

Why do you listen more to environmentalist groups and wildlife people when they contribute little or nothing toward providing food for "we the people". "We the people" need a few of you bureaucrats on our side.

ally in the way of life and livelihood of "we the people" who call the Arizona Strip our home?

Why can a fair and true evaluation be made during the worst drought in many years when, in fact, if you would be fair and just, you should look at the range under more favorable circumstances?

It is a sad situation when the good solid citizens of an area lose confidence in any department of government. I don't like to see people so scared and angry, even though they have good reason to feel this way. It is sad indeed when people are forced to fight government bureaucracy for their rights as citizens of the Arizona Strip. It is sad, too, when there are so many who, when they begin to draw a government pay check, feel that they are the United States Government.

There is a lot more that I would like to say, but it appears that the decisions have already been made. You say you will listen, but can you hear? Hopefully this can still be a Government of the people, by the people, and for the people. Thank you.

Owen H. Johnson
Owen H. Johnson

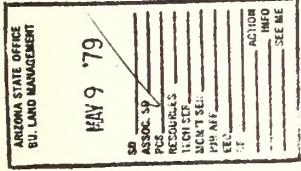
29-1

A forage inventory indicated that a livestock reduction is needed to bring livestock numbers within the carrying capacity, as provided by desirable plant species.

Why has the Federal bureaucracy become so powerful as to interfere so drastically in the lives of the people?

29-2

Although operators in the Clayhole allotment testified that their livestock have been hurt, vegetation trend data show an upward trend. BLM now has a system on the Clayhole allotment that should remedy this livestock problem. The operators on the Clayhole allotment testified that they wanted to continue on the six-pasture rest-rotation system. Several allotments on the Arizona Strip show an upward trend in both vegetation and livestock, and some operators in the Shivwits ES area will receive increases in AUMs.



May 5, 1979
Jacob Lake, Az.

Arizona State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Az.

Dear Mr. Buffington,

I feel that the writers and compilers of the Vermillion Draft Environmental statement have done a marvelous work with the time and limited facilities available to them. One of the drawbacks to the work they have done, I think, as pertains to rest-rotation planning, is the extremely limited distribution of rain gauges.

Considering the fact that the soil is forever, wouldn't it be worthwhile to have enough gauges to give a clearer rainfall picture - perhaps one guage per township? Then we could get a more accurate picture of rainfall and rainfall variation and distribution.

One point which is vital to our operation on the Paria Plateau is a knowledge of the soil composition. When we started ranching there in 1952 our calf crop was about 30% - calves weighed about 250 pounds at weaning and eight years was a long time for a cow to live.

We began a program of plant and soil analysis and discovered approximately the following for the Paria Plateau.

CONCENTRATION IN SOIL

Mineral	Good	Fair	Poor	Absent
Calcium		✓		
Phosphorous			✓	
Iodine				✓
Cobalt				✓
Potassium			✓	
Copper			✓	

No minerals tested good except Silica and Iron.

We also discovered that there were great variations in the minerals in the plant analysis. The Testing lab said that was due to the soil moisture.

They said that in dry years there can be mineral deficiencies in the plants even when the soil tests are high. In very wet years the plants can test fairly high in minerals when the soil tests are low. The lab said that was due to there being enough moisture in the soil to ionize the minerals so the roots can absorb them into the plant.

I don't mean to present myself as an expert, but I have a Masters Degree in Geology and 30 years of experience in ranching here, and I grew up on a good farm. If my observations are of any value to you then might I suggest that the B.L.M. consider a more intensive program of precipitation measuring, soil testing, plant seeding and testing, and soil erosion. You have done much in livestock rotation and stocking plans, but little in other areas that I know of.

The public ranges furnish millions of pounds of meat and hides and wool that would consume millions of barrels of oil to produce on farms. And it would take millions of barrels more oil to transport the finished products to the consumers. The public grazing lands make a great contribution to American food supplies.

Of course there is recreation and water supplies to consider and all the other values contributed by the land. And the land needs to be protected and improved. My sons are, I think as interested in rebuilding and protecting the land both public and private as are the B.L.M. employees. It's exciting to see the growth of land consciousness and general awareness of the lands vital importance to all of us.

The restoration, reseeding, and erosion control of our Western land could be an exciting and rewarding undertaking for the people of this country - both old and young. It could be a nation-wide project that could give thousands of young people a sense of purpose and accomplishment. They could gain invaluable experience and knowledge on the job. I see men frequently who bring their families here to show them the projects they worked on while they were in the C.C.C. in the 30's.

My sons helped put in pipe lines and build stock tanks and fences on the Paria Plateau starting when they were 12 years old. You can bet they would fight for their country. It was work not welfare that gave them that feeling.

It's interesting to be involved in the growing consciousness of our nearly total dependance on the land. I hope to see our knowledge and use of it grow and improve.

Sincerely,

John P. Rich
Vermilion Cliff Cattle Co.
Jacob Lake, Az. 86051

30-1

BLM is moving more into precipitation measuring, soil testing, soil erosion control, and seeding. The Soil Conservation Service, under BLM contract, is compiling a third order soil survey. BLM has done much in the past to control soil erosion, such as the large dike projects in Clayhole Wash. Today BLM has 18 weather stations, where 5 to 10 years ago it had none. BLM has carried out seeding projects in the past and plans for more in the future. All these measures are necessary to make AMPs function better.

The soil-mineral tests should be included in your management plan.

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United States Department of the Interior



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N REPLY REFER TO:
17610

NATIONAL PARK SERVICE
GRAND CANYON NATIONAL PARK
GRAND CANYON ARIZONA 86023

L7619

N R E P L Y R E F E R T O :
L7619

Mr. Robert Buffington
State Director
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 850

Dear Buff:

Thank you for giving us the opportunity to comment on the Draft Environmental Statement for the Proposed Grazing Management Program, Vermillion Resource Area. We appreciate the difficulty of preparing these documents and offer the following comments as they relate to Grand Canyon National

1. The Vermillion Resource Area includes land being studied for possible inclusion into the national park. This information is important to decisions involving the immediate and long-range use of lands identified in the Environmental Impact Statement. The information contained in this Task Directive, Adjacent Land Study, needs to be integrated into the EIS and the Directive listed as a reference.
 2. The maps in the draft Environmental Statement depict the boundary of the Resource Area with the national park, in the vicinity of Marble Canyon, inaccurately. The map in the Task Directive-Adjacent Land Study depicts the correct boundary in this area as identified in Public Law 93-620. The Park has in the past advocated the establishment of a buffer zone between the park and B.L.M. land in this area. The park's recommendation is indicated in red on the attached map and includes approximately 7,300 acres of B.L.M. land. This recommendation was advocated in correspondence to the State Directors Office in 1975.

The need for this buffer zone was emphasized in the recent Navajo Land Selection Draft Environmental Impact Statement. The possibility of adverse impacts resulting from new developments identified within that document warrants renewed consideration of the buffer zone proposal.

We feel this buffer zone as outlined in the attached map would accomplish the following:

- A. It would simplify the confusing park boundary situation and ensure the integrity of this boundary.
- B. It would ensure the preservation of this area of the national park against proposed rim developments.
- C. It would provide an effective buffer between grazing and possible adverse recreational use (off road vehicles) and help to preserve

D. The zone would recreate a continuous VRM Class I area which would enhance the national park as well as BLM lands.

Page 1-29, Interrelationships. The plan should update two grazing allotments identified under National Park Service jurisdiction as now being adjacent to Grand Canyon National Park instead of Glen Canyon National Recreation Area. In fact, the Soap Creek and Badger Creek grazing allotments bordered Marble Canyon National Monument and not Glen Canyon National Recreation Area. The monument was converted to national status as a result of the 1975 Grand Canyon National Park Enlargement (P.L. 93-620).

Page 2-17, Bighorn Range. Park observations indicate a number of species use the Marble Canyon area of the park including its major side canyons. This fact should be included on the map and in the Impacts section of the EIS.

Page 2-25, Fish. Two endangered fish species, the humpback chub (*Cyprinodon nevadensis*) and the Colorado River squawfish (*Ptychocheilus lucius*) are found within this section of the Colorado River in the national park. The confluence of the Colorado River with the Little Colorado River was established May 1, 1979, to all fishing for the protection of one of the last remaining populations of the humpback chub. This was accomplished under section 7 (Endangered Species Act) consultation with the U.S. Fish & Wildlife Service. You may want to include this information in Table

Page 2-26, Threatened and Endangered Species. Recent surveys conducted by Dr. Dave Ellis (U.S. Fish & Wildlife Service) indicate several breeding pairs of peregrine falcons within the Marble Canyon area of the national park. Although no exact data is available to quantify this raptor, the number of sightings of these birds in this area confirms there are considerable numbers of these endangered birds within the park. You may want to use this information to expand upon the environmental impacts of your proposed actions.

31-1 **31-2** **31-3** **31-4** **31-5**

31-6

depicts the correct boundary in this area as identified in Public Law 93-620. The park has in the past advocated the establishment of a buffer zone between the Park and B.I.M. land in this area. The Park's recommendation is indicated in red on the attached map and includes approximately 7,300 acres of B.I.M. land. This recommendation was addressed in correspondence to the State Directors Office in 1975.

31-2

9-65

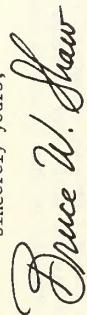
7. Page 2-33, Visual Resources. Grand Canyon National Park has been designated as a Class I "Prevention of Significant Deterioration" area under the Clean Air Act Amendments of 1977. This fact should be pointed out in this section of the document and also in the environmental impacts section. Any increase of dust due to grazing management practices or range developments on the Resource Area which might deteriorate the quality of air in the national park must be identified and mitigated in the plan. This information should also be included in the "Impacts On The Visual Resources" section of the plan.

8. Page 2-47, Wilderness. Marble Canyon is recommended for inclusion in the Wilderness Preservation System. You may want to include this information in the appropriate sections of the EIS. The reference for this is Preliminary Wilderness Proposal, Grand Canyon National Park, Arizona, and Draft Environmental Statement, July, 1976. Copies of these documents should be in your files. The Final Wilderness Recommendation and Environmental Statement have never been published but are ready for presentation to Congress.

With the exceptions of the above considerations and comments, the national park supports the proposed plan for intensive management of grazing on the Vermillion Resource area.

Once again, we appreciate the opportunity to review the Environmental Impact Statement and wish you well in your management efforts.

Sincerely yours,



Merle E. Stitt
Superintendent

31-7

31-1 Page 2-33, Visual Resources. The lands involved in the adjacent land study were not discussed since boundaries and lands now involved are not well defined. nor is future action on this matter.

31-2 The boundary between BLM-administered public lands and Grand Canyon National Park is not accurate, since the source maps had not been updated with PL-93-620. The map represents the best existing boundary data at the time of map compilation in 1977.

31-3 The matter of a buffer zone is in the discussion stage only. The Vermillion draft ES was prepared for existing conditions, and analyzes the impacts of the proposed action and alternatives on the existing situation.

31-4 Since Marble Canyon is outside the ES area, its fauna were not discussed.

31-5 The Colorado River is not in the ES area, and the proposal and alternatives were determined not to have a significant impact on the Colorado River fishery.

31-6 See page 3-29, Threatened and Endangered Species.

31-7 Grazing management and range improvements would raise insignificant additional dust, so this problem was not discussed. The impact analysis projected no decrease in air quality from the proposed action or its alternatives. Editorial comments have been noted.

ARIZONA

OFFICE
OF THE
GOVERNOROFFICE OF
ECONOMIC PLANNING AND DEVELOPMENT

1700 West Washington, Rm. 505

General Offices of the
ARIZONA STATE OFFICE
BUREAU OF LAND MANAGEMENT

• 4th Floor

May 15, 1979

Mr. Bill Carter
 Environmental Coordinator
 Bureau of Land Management
 Arizona State Office (911)
 2400 Valley Bank Center
 Phoenix, AZ 85073

MAY 16 '79

SD	ASSISTANT SECRETARY
FC	FORWARDED
REC'D. SER.	RECEIVED
INFO USE	INFO USE
FBI INFO	FBI INFO
TE	TELEGRAM
DP	DEPARTMENT
ACTION	
INFO	
C. REC	

Re: Vermillion Proposed Grazing Management - Draft Environmental Statement
 S.A.I. #79-80-0022

Dear Mr. Carter:

Enclosed is a copy of a response concerning the above project which was received by us after our Signoff to you.

Sincerely,

Mrs. Jo Youngblood, Supervisor
 Arizona State Clearinghouse
 JY: ss
 Encl.

Proposal supported as written.

JACKSON, MCCLIFF & MOWER
ATTORNEYS AT LAW
151 NORTH MAIN STREET
RICHFIELD, UTAH 84701

NORMAN J. JACKSON
K. L. MCCLIFF
DAVID L. MOWER

TELEPHONE 896-5444
AREA CODE 801

ARIZONA STATE OFFICE
BU. LAND MANAGEMENT

MAY 21 '79

May 16, 1979

Mr. B. Buffington
Arizona State Director (911)
Bureau of Land Management
2400 Valley Bank Center
Phoenix, Arizona 85073

Re: Draft Environmental Statement - Vermillion Area
Proposed Grazing Management
(Arizona Strip)

Dear Mr. Buffington:

The following comments are submitted for the record.

- At page 2-53, with respect to the five year average of licensed AUMs being at 85% of the allowable AUM level, the following statement is made: "The reasons for the operators lower use are unknown." This is either an erroneous mis-statement or an outright misrepresentation. My files contain letters written to the BLM District Office during that time requesting consultations for the purpose of adjusting the stocking level due to severe drought conditions. BLM Officials are very much aware that three years of drought during that five year period was the reason for the adjustment. As a result, the five year base period lacks credibility. A ten year lease period should be used beginning with the most current year.
- Those allotments that are already operating under management plans should be permitted to continue rather than having the management plans superseded by the environmental statement. In other words, the parties to the management agreement should continue management pursuant to the plan, on an individual basis, unaffected by a proposal for the entire area. In addition, funding of range improvements agreed upon in the management plans should be made without further delay so the objectives agreed upon can be attained in the agreed timeframe.

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The 5-year average licensed grazing use period was determined adequate for the ES area, based upon trends recorded in the Arizona Strip District's Grazing Statistical Report files.

For your information, Arizona Strip District grazing statistics covering the 12 grazing year periods of 1966 through 1977 and the grazing year periods corresponding to the 5-year period used in the draft ES are presented in the following table.

		Grazing Statistics-Arizona Strip District		
		ES 5-Year Period		Total Grazing
		Fee Year	Total Grazing	Use AUMs
SD	ASSOC. SD	1966	195,396	+
RESOURCES		1967	154,056	
TECH SER.		1968	202,713	+
BUREAU		1969	212,043	+
1970	DE TAC	1970	219,381	+
		1971	175,438	
		1972	196,041	+
		1973	184,848	
		1974	187,560	
		*1975	196,557	+
		*1976	189,578	
		*1977	187,520	

Average Grazing Use:
*Recent significant drought years.
+Exceeds average use.

190,917 AUMs

The 5 years of data reveal an average grazing use almost the same as the 12-year average. The difference of 0.44 percent is not statistically significant.

By court order in the case, Natural Resources Defense Council, Inc. (NRDC) vs. Rogers C. B. Norton, decided December 30, 1974 in Federal Court, District of Columbia, that BLM may not exclude operating AMPs from grazing environmental statements. The Federal court order requires preparation of environmental statements that discuss in detail the environmental effects of livestock grazing on public lands that are or will be licensed for such use.

As part of the final court order dated June 18, 1975, BLM negotiated an agreement with the NRDC concerning, among other subjects, allotment management plan (AMP) implementation and range improvement work. BLM agreed that no AMP or its equivalent would be implemented after June 30, 1975 before completion of an ES covering such an AMP. Furthermore, BLM recognized that actions supportive of grazing may have significant impact on

the environment and that in those cases no such action(s) would be undertaken before full consideration of the impacts in an ES. Supportive actions include fencing, water development, spraying, chaining, seeding, and brush removal.

Following further discussions and negotiations with NRDG in 1976, BLM relaxed the limitations on range improvement work. Projects are presently restricted where significant impact on resources or uses would occur or where wilderness characteristics would be altered. BLM has further limited range improvement work because many existing AMPs may require modification to mitigate conflicts and environmental impacts. For these reasons many improvements have been postponed until a full environmental assessment has been completed. In addition, BLM has been obligated to limit range improvement work so that manpower can be devoted to assure meeting the court-ordered ES preparation schedule.

I would like very much to receive details of the basis for these computations and predictions. Would you please assist me in obtaining this information? Thank you.

Very truly yours,

Norman H. Jackson

NHJ/cm

33-3

3. Concerning ranch values and economics set forth at page 3-48 it is proposed that this small number of ranch operators absorb a decrease in ranch value of over \$4,000,000.00. There is no substantiation of these figures. At 1979 values, this figure could very easily be \$8,000,000.00. To impose this kind of burden on the operators when they are just recovering from the low-price side of the cattle cycle is beyond justification. I seriously question the prediction that this would be recouped at any time and particularly within the 15 years predicted.

I would like very much to receive details of the basis for these computations and predictions. Would you please assist me in obtaining this information? Thank you.

33-3

As discussed in the draft ES, ranch value is difficult to estimate and depends upon many variables, including the location and the condition of the area involved. The ranch value estimate used in the draft ES is based on informal discussions with operators, District personnel, and financial interests in the area. It represents an average value for operations in the ES area during early 1978, when the analysis was conducted for ES preparation. The values for 1979 would be higher.

For the Shiwits ES analysis, in February 1979 we held four meetings with 14 ranchers from the Shiwits Resource Area to gather economic information on typical ranch operations within the area. The information gathered from these ranchers indicates that the average 1979 ranch value in the Arizona Strip would be 20 percent higher than that stated in the Vermillion draft ES. Therefore, the loss for large operations would be 120 percent of that projected in the draft ES or \$4,985,000.

The prediction that ranch value would return to existing levels is based on our analysis, which indicates that the quantity and quality of ES area forage would improve above existing conditions. The projection (in the draft ES, pages 3-3 to 3-15 and pages 3-35 to 3-41) that the range would recover and improve was made by District range and wildlife specialists and is based on careful study of existing AMPs, the current literature relating to range management, and Soil Conservation Service range site descriptions. The basis for predicting changes in the vegetation resources and forage production appears in appendices 1-1, 2-3, 2-5, 3-1 and 3-2. Appendix 3-4 describes the method for predicting future range condition and forage production.

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